Exhibit 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - -

SHABTAI SCOTT SHATSKY, individually and as personal representative of the Estate of Keren Shatsky, J ANNE SHATSKY, individually and as personal representative of the Estate of Keren Shatsky, TZIPPORA SHATSKY SCHWARZ, YOSEPH SHATSKY, SARA SHATSKY TZIMMERMAN, MIRIAM SHATSKY, DAVID RAPHAEL SHATSKY, GINETTE LANDO THALER, individually and as personal representative of the Estate of Rachel Thaler, LEOR THALER, ZVI THALER, ISAAC THALER, HILLEL TRATTNER, RONIT TRATTNER, ARON S. TRATTNER, SHELLEY TRATTNER, EFRAT TRATTNER, HADASSA DINER, YAEL HILLMAN, STEVEN BRAUN, CHANA FRIEDMAN, ILAN FRIEDMAN, MIRIAM FRIEDMAN, YEHIEL FRIEDMAN, ZVI FRIEDMAN, and BELLA FRIEDMAN,

Plaintiffs,

against

Case No. 18-Civ. 12355

VIRTUAL VIDEOTAPED DEPOSITION OF DR. RIYAD MANSOUR

THE PALESTINE LIBERATION ORGANIZATION and THE PALESTINIAN AUTHORITY (a/k/a "The Palestinian Interim Self-Government Authority" and/or "The Palestinian National Authority"),

Defendants.

- - -

VIRTUAL VIDEOTAPED DEPOSITION OF DR. RIYAD MANSOUR, a witness herein, called by the Plaintiffs, for examination, taken pursuant to the Federal Rules of Civil Procedure, by and before Karen A. Nickel, a Certified Realtime Reporter and a notary public in and for the Commonwealth of Pennsylvania, held remotely with all parties appearing from their respective locations, on Thursday, July 8, 2021, at 9:30 a.m.

COUNSEL PRESENT:

For the Plaintiffs:
Ronald F. Wick, Esq. (Admitted Pro Hac Vice)
Cohen & Gresser, LLP
2001 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20006

Stephen M. Sinaiko, Esq.
Cohen & Gresser, LLP
800 Third Avenue
New York, NY 10022

For the Defendants:
Mitchell R. Berger, Esq.
Joseph Alonzo, Esq.
Salim Kaddoura, Esq.
Squire Patton Boggs
2550 M Street NW
Washington, DC 20037

Also Present: Cosette Vincent
Eszter Vincze

- - -

I N D E X

WITNESS	PAGE
Dr. Mansour	
By Mr. Wick	6

E X H I B I T S

NUMBER	DESCRIPTION	PAGE
Exhibit 1	Notice of Deposition	20
Exhibit 2	Personnel of the Permanent Observer Mission	20
Exhibit 3	Calendar Entries	31
Exhibit 4	Privilege Log	39
Exhibit 5	Facebook Page	50
Exhibit 6	Video	84
Exhibit 7	ADC Appearance	91
Exhibit 8	Beit Sahour Convention	94
Exhibit 9	Seton Hall Appearance	98
Exhibit 10	Bridgewater Appearance	106
Exhibit 11	Morning Joe Interview	111
Exhibit 12	Al Jazeera Interview	113
Exhibit 13	Diplomatic Corp Law	134
Exhibit 14	Responses and Objections	167
Exhibit 15	List of Organizations	186

P R O C E E D I N G S

THE VIDEOGRAPHER: Good morning, everyone. We are now on the record. Participants should be aware that this proceeding is being recorded and, as such, all conversations held will be recorded unless there is a request and agreement to go off the record.

This is the remote video-recorded deposition of Riyad Mansour. Today is Thursday, July 8, 2021. The time is now 13:32 UTC time.

We are here in the matter of Shatsky versus PLO. My name is Corey Wainaina, remote video technician on behalf of US Legal Support located at 90 Broad Street, New York, New York.

I am not related to any party in this action, nor am I financially interested in the outcome. At this time, will the reporter, Karen Nickel, on behalf of US Legal Support, please enter the statement for remote proceedings into the record?

THE REPORTER: The attorneys participating in this deposition acknowledge that I am not physically present in the deposition room and that I will be reporting this deposition remotely.

They further acknowledge that, in lieu of an oath administered in person, the witness will verbally declare his testimony in this matter is under penalty of perjury.

The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting. Please indicate your agreement by stating your name and your agreement on the record.

MR. WICK: This is Ron Wick, Cohen and Gresser, for the Plaintiffs, and the Plaintiffs agree.

MR. BERGER: This is Mitchell Berger for the Defendants, we agree.

DR. RIYAD MANSOUR, a witness herein, having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. WICK:

Q. Good morning, Dr. Mansour.
A. Hi.
Q. I thank you for coming today.
A. Welcome.

Q. My name is Ron Wick. I represent Plaintiffs in this lawsuit. And let me just ask you off the bat, have you had your deposition taken before?

A. Yes.

Q. Okay. So you are somewhat familiar with the process but let's just -- I'm going to ask you some questions, of course, but before I do that, I want to go over the process with you so that we are all on the same page. Is that all right?

A. Okay.

Q. The court reporter will be transcribing everything we say today, so to make sure that the record is accurate, and especially since this deposition is taking place by a video conference, it is important that we not speak over each other, so that only one person speaks at a time.

I would ask that you please wait until I finish my questions before you start to answer them, and I will do my very best to wait until you finish your answer before I ask another question.

Fair enough?

A. I will do my best. Thank you.

Q. Okay. It is also important that you respond to my questions verbally. For example, if you shake or nod your head, the court reporter cannot transcribe that answer.

A. I understand.

Q. If you don't understand a question, please let me know, I will try to rephrase it for you. If you do answer a question, I will assume that you understood. Okay?

A. Okay.

Q. Your counsel, Mr. Berger, undoubtedly will object to some of my questions. Unless your counsel instructs you not to answer the question, you should go ahead and answer my question even though there was an objection. Is that understood?

A. Yes.

Q. We will be taking periodic breaks through the deposition. If at any point you need a break, please let me or Mr. Berger know. I will do my best to accommodate your request.

The only thing I ask of you is that, if a question is pending, I would ask you answer that question first before we take a break. All right?

A. I understand.

Q. Are you taking any medication today that would prevent you from answering my questions fully and accurately?

A. No.

Q. Is there any other reason that you can think of as to why you would not be able to answer my questions today fully and accurately?

A. No.

Q. Just a few terms I want to go over that I will be using during the course of the deposition and I want to make sure that we are all on the same page.

I will be referring, from time to time, to the PA, and by that I mean the Palestinian Authority; is that okay?

A. Okay.

Q. And I will use the term PLO to refer to the Palestine Liberation Organization; understood?

A. Yes.

Q. And I may use the shorthand term Observer Mission, by which I mean the Permanent Observer Mission of the State of Palestine to

the United Nations; is that all right?
A. It is okay.
Q. Okay. If we could go to the first tab. I'm going to show you a document, Mr. Mansour.
A. Okay.
THE VIDEOGRAPHER: Counsel, would you like to see the document and the witness for the video record?
MR. WICK: Yes, please.
THE VIDEOGRAPHER: Okay.
BY MR. WICK:
Q. Dr. Mansour, I'm showing you a copy of a Notice that the Plaintiffs in this action, my clients, sent to your counsel regarding your deposition today. Have you seen a copy of this Notice?
A. No.
Q. I'm sorry?
A. No.
Q. You have not seen a copy?
A. Except now in front of me.
Q. Okay. How did you learn that you were being asked to testify at a deposition today?

A. By my lawyer.

Q. I don't want you to tell me anything that you talked about in that regard with your lawyer. Is it your understanding that you are testifying today pursuant to this Notice of Deposition?

A. Yes.

Q. Did you do anything to prepare for your deposition?

A. Yes.

Q. What did you do?

A. Met with my lawyer.

Q. And was anybody else present when you met with your lawyer?

A. No.

Q. Did you meet with anybody other than your lawyer to prepare for your deposition?

A. No.

Q. And did you review any documents in preparing for your deposition?

A. I believe that I have seen documents, I understood from my lawyer, that have been provided to you, basically, about my schedule.

Q. So you reviewed the calendar

documents that were provided to us?
A. Yes.
Q. Do you -- to the best of your recollection, did you review any other documents in preparation for your deposition today?
A. No.
Q. And when you said you met with your lawyer to prepare for your deposition, are you referring to Mr. Berger?
A. Yes.
Q. Did you meet with any other lawyers?
A. Early in the process, yes, but the -- for this deposition is with Mitch.
Q. By "early in the process," do you mean at the beginning of the lawsuit?
A. No. When we were approached to make deposition.
Q. And, approximately, how long ago was that?
A. A month, month and a half ago.
Q. And at that time, who did you meet with?
A. I think Mitch can -- I don't remember the names, Mitch can remember them.

One, Baloul, I think, I believe, his last name. The other one I don't remember.

Q. Mr. Baloul?

A. Yes.

Q. And there was another attorney as well?

A. Yes.

Q. Was it Mr. Alonzo?

A. I don't remember the name.

Q. Fair enough. And when you reviewed your calendar entries that were provided to us in preparing for your deposition, did those documents refresh your memory at all as to any events?

A. Yes.

Q. Specifically, did they refresh your memory as to the events in question on the calendar?

A. Calendar is very basic as to hundreds of meetings. So it refreshed my memory as to which meeting, with whom, so that I remember, you know, these sort of -- to refresh my memory about these things, yes.

Q. And did you bring any documents with you to the deposition today?

A. No. Other than the two documents that I have here.

Q. What are the two documents that you have there?

A. These two documents. This one, this one.

Q. Okay. It appears to me that you are showing me the copy of your calendar entries and a copy of the Defendants' revised privilege log?

A. Yes.

Q. Is that correct?

A. Yes.

Q. Okay. I would like to just step back for just a moment and do a quick housekeeping measure. I understand that Ms. Nickel is in Pennsylvania. Dr. Mansour, where are you today?

A. In my office in New York, 115 East 65th Street, New York, New York.

Q. So you are in the Observer Mission building?

A. Yes.

MR. WICK: I just want to be clear that we are all in agreement, per Rule 29 of the Federal Rules of Civil Procedure, that Ms. Nickel is an appropriate officer before whom today's deposition can be taken.

Are we in agreement on that, Mr. Berger?

MR. BERGER: Yes. So stipulated.

MR. WICK: Thank you.

BY MR. WICK:

Q. Dr. Mansour, you indicated earlier that you had had your deposition taken before. On how many occasions have you had your deposition taken previously?

A. I remember one about 20 some years ago.

Q. And do you recall what that case was about?

A. Yes. It was a case of Palestinian-American businessman, and the case, I believe he -- a case of undocumented alien --

THE COURT REPORTER: I'm having a little bit of trouble hearing the witness. He's cutting out a little bit and I did not hear the end.

THE WITNESS: Can you hear me

now?

THE COURT REPORTER: Yes.

THE WITNESS: I said that, yes, I appeared in a case about 20 years ago in Orlando, Florida, a case of a Palestinian-American businessman accused of employing undocumented aliens in his business.

BY MR. WICK:

Q. Were you a party to that case, a Plaintiff or Defendant?

A. I was not a party, but I was organizing the legal counsel for that Defendant.

Q. I'm sorry, I didn't understand your answer. Could you please repeat that?

A. I said I was organizing a legal counsel in the defense of the Defendant.

Q. You were organizing legal counsel in the defense?

A. Yes.

Q. Why was that?

A. Because he was a friend and part owner of the company that I worked for.

Q. And which company was that?

MR. BERGER: This is focused

on jurisdictional predicates, and I don't see what his prior deposition testimony has to do with anything.

MR. WICK: I think this is basic background questioning, Mitch. I don't plan to spend a lot of time on it.

MR. BERGER: You can answer.

THE WITNESS: It is Interim Investment Commercial Company in Orlando, Florida.

BY MR. WICK:

Q. Interim investment company?

A. Yes.

Q. Okay. And have you previously testified in court?

A. Yes, I testified during the course -- the prosecutor wanted me to testify, and I did.

Q. And that was in the same case where you gave your deposition?

A. It wasn't a deposition. I don't know if there is a difference between deposition and testifying, but I did that in that case.

Q. Okay. Were you in a courtroom?

A. Yes.
Q. Okay. Other than that occasion where you testified in the case involving interim investment --
A. I don't recall.
Q. Have you ever -- do you recall ever testifying under oath?
A. I don't recall.
Q. Fair enough. Dr. Mansour, are you a U.S. citizen?
A. Yes.
Q. Are you a naturalized U.S. citizen?
A. Yes.
Q. And where do you currently live?
A. I live in New York, 115 East 65th Street.
Q. Do you have a residence at the Observer Mission?
A. Yes.
Q. And just to be clear, 115 East 65th Street is the address of the Observer Mission building; correct?
A. And also, yes, the place where I live.
Q. Understood. And has the Observer

Mission building been your primary residence at all times since January 4, 2020?

A. Yes.

Q. Does anyone live there with you?

A. My wife.

Q. Anyone else?

A. There is a lady that takes care of the building.

Q. I'm sorry, you said that there is a lady that takes care of the building?

A. Yes.

Q. And she lives in the residence with you?

A. Yes.

Q. And what is her name?

A. Almaz, and her last name is difficult to pronounce for me, she is Ethiopian.

Q. Does she work for the Observer Mission?

A. Yes.

Q. I'm going to spell the name. Is it first name A-L-M-A-Z, last name J-O-U-D-E-E-T-A?

A. If you have it in a document, I

think you are correct.

(Deposition Exhibit Nos. 1 and 2 were marked for identification.)

BY MR. WICK:

Q. Dr. Mansour, I'm showing you Exhibit 2, which is a list provided by your counsel of what we understand to be personnel of the Observer Mission since January 4, 2020. And I would ask you to look at that document and tell me if the name of the person that lives with you and your wife at the Observer Mission building is on that list?

A. Yes, it's the last name.

Q. Almaz Joudeeta?

A. Yes.

Q. I apologize for any mispronunciation. I'm doing the best I can as well.

Has she also lived in the Observer Mission building at all times since January 4, 2020?

A. Yes.

Q. And does she -- let me step back.

In addition to taking care of the building, does she also take care of your

residence in the building?
A. Yes.
Q. She acts as a housekeeper for your residence?
A. Yes.
Q. Does she have any responsibilities in taking care of the building besides taking care of your residence?
A. No.
Q. She doesn't perform any custodial work in the offices of the building, for example?
A. You mean cleaning, cleaning the offices?
Q. Yes.
A. Yes, she does.
Q. She does do that?
A. Yeah.
Q. Okay. And who pays Ms. Joudeeta?
A. The Mission.
Q. The Observer Mission?
A. Yes.
Q. And as a resident of the Observer Mission building, have you spent most of your nights there since January 4, 2020?

A. Yes.
Q. And did you regularly take your meals there?
A. There or in a restaurant. During that period of time, most of it in house.
Q. Understood. And does Ms. Joudeeta also prepare meals?
A. Yes. I must say she is not a good cook. I shouldn't say that.
Q. Fair enough. We will not share that with her.
A. Okay. That's good.
Q. And do you entertain visitors in the residence from time to time?
A. During the period of time that you referred to, very, very few because of COVID.
Q. Understood. But you do receive visitors there from time to time; correct?
A. Yes.
Q. Including social visitors?
A. Yes.
Q. And you have received social visitors on multiple occasions since January 4, 2020?
A. Yes.

Q. Have you hosted any parties in the residence since January 4, 2020?

A. Parties, no. But at the maximum, lunch or dinner for maybe four or six individuals, the highest number that we hosted in the house.

Q. And have you had social visitors to your residence who are not affiliated with the United Nations?

A. Yes.

Q. How is the Observer Mission building divided between the Mission offices and your residence? Are you on a separate floor?

A. I will give you a description. In the ground floor, there is a small apartment for Almaz and a reception room.

Then the two floors above that are the residence where I live. And the two floors above the residence are the offices where we work.

And we have a rooftop.

Q. So the offices are on the fourth and fifth floors?

A. Yes.

Q. And Almaz, that's her own apartment,

she does not live in your residence; correct?

A. As I said, in the ground floor, don't call it the first floor, we call it the ground floor, that's where Almaz lives, there is a small apartment for her. And the residence is the first floor and the second floor. And the offices are on the third floor and the fourth floor, if you count as ground floor as ground floor.

Q. Does the Mission, does the Observer Mission use the rooftop at all?

A. Under -- during normal times, some of the smokers used to use the rooftop for smoking, but during the period that we are talking about, because of COVID, things drastically changed. It was hardly used.

Q. Did you ever use the rooftop?

A. In rare occasions, especially at night, it was a nice view of Manhattan at night from the rooftop.

Q. And have you -- and, again, I just want to focus on the period since January 4, 2020, have you entertained any visitors on the rooftop?

A. During that period of time, not that

I recall.

Q. And to the extent that you have social visitors in your residence, are those authorized uses of the Observer Mission building?

A. What do you mean by "authorized use"?

Q. Do you have permission from the -- does the Mission permit you to have social visitors in your residence?

A. Yes.

Q. And there is -- how many entrances are there to the Observer Mission building?

A. From 65th Street, two; one residence entrance and one a staff entrance. And there is an entrance in the back, actually -- not on the floor -- same door in the back from Almaz's apartment, and then there is an entrance to the rooftop of the building.

Q. Is there a separate entrance to your residence?

A. Yes.

Q. Who owns the Observer Mission building?

A. The Mission.

Q. And who pays the expenses for the building?
A. The Mission.
Q. And where does the Mission obtain the funding to pay for the building?
A. From the State of Palestine.
Q. And by the "State of Palestine," are you referring to the PA?
A. The State of Palestine, I am referring to the State of Palestine. This is the Observer Mission of the State of Palestine of the UN, and I am Ambassador Observer of --
THE COURT REPORTER: I'm sorry, the witness is cutting out again.
THE WITNESS: I said I am the Ambassador Observer of the State of Palestine for the United Nations.
BY MR. WICK:
Q. What is your relationship between the State of Palestine and the PA?
A. PA was formed by Palestine Liberation Organization. Palestine Liberation Organization is political party that is part of the State of Palestine.
Q. I think that I and perhaps the

reporter may have missed the first part of your answer regarding the Palestinian Authority. So I'm going to ask the question again because you are cutting out in your response from time to time.

What is the relationship between the Palestinian Authority and the State of Palestine?

A. Palestinian National Authority, referred to it as the PA, was established by the Palestine Liberation Organization as a result of the Oslo agreement. Palestine Liberation Organization is the umbrella from -- encompassing all political parties in Palestine, those who are in the PLO, and the State of Palestine is encompassing all these things, including those who are not in the PLO. It is like any other country.

Q. Do you pay any rent to the Observer Mission for your residence?

A. No, I don't.

Q. And does Almaz pay any rent?

A. No.

Q. Is residence in the Observer Mission building a benefit that the Observer Mission

provides to you?
A. It comes with the job as the one before me and it will be done to the one after.
Q. And so it is provided as a benefit to you?
A. It is provided to me as part of the job.
Q. And is it also provided to Ms. Joudeeta as part of the job?
A. Yes.
Q. Do you have any other residences in the United States?
A. I have a personal house in Orlando, Florida.
Q. And does the Observer Mission pay any expenses for your house in Florida?
A. No.
Q. Does the PLO pay any expenses for your house in Florida?
A. No.
Q. Does the PA pay any expenses for your house in Florida?
A. No.
Q. Have you resided at any other properties in the United States since January

4, 2020?

A. What do you mean by "resided"?

Q. Lived.

A. Visited, yes.

Q. But there are no other -- but there are no other homes where you have lived during that time period?

A. No other home that I lived. Visited, yes.

Q. By "visited," you mean visiting as a guest in somebody else's home?

A. Yes.

Q. I'm not asking about that. That's fine.

Are there any expenses that the Observer Mission pays for besides providing you with the residence at the Observer Mission building?

A. Can you repeat the question again, please?

Q. Certainly. I will rephrase it.

Does the Observer Mission, in addition to providing you with a residence in the Mission building, pay any other expenses of yours or reimburse you for expenses?

A. They pay a certain percentage of my cell phone because I use it for my work.

THE COURT REPORTER: I'm sorry, of your what?

THE WITNESS: My cell phone, mobile phone, they pay a certain percentage of the monthly bill because I use it mostly for my work.

BY MR. WICK:

Q. Are there any other expenses that the Observer Mission pays?

A. Not that I recall. If there are things related to the work, my work at the United Nations, then it happens. For example, if I take group of Ambassadors to a lunch or dinner related to our work and I am the host, then, you know, I get reimbursed for that because this is a business expense.

Q. Does the Observer Mission provide you with a car?

A. There is a car for the house, yes.

Q. I'm sorry, a car for the office or for the house?

A. Yes, yes. It is owned by the Observer Mission and it is a car that takes me to the UN and my meetings. This is a customary thing for all Ambassadors, yes. And a driver with it, too.

Q. And that driver is also paid by the Observer Mission?

A. Yes.

Q. And what is the driver's name?

A. My current driver is Ali Mohammad Issa.

Q. Bear with me here just a moment, please.

Let's go to Tab 3. I'm going to show you a document, Dr. Mansour, that I would like to have marked as Exhibit 3.

(Deposition Exhibit No. 3 was marked for identification.)

BY MR. WICK:

Q. This document is numbered Shatsky-JD00545, it's six pages, through Shatsky-JD00550.

Dr. Mansour, is this the document that you showed me earlier that you have with you reflecting your calendar entries?

A. I believe so, yes.

Q. And to the best of your knowledge,

MR. BERGER: Ron, I really don't know what you mean by "the general nature." You have asked a question about whether something is a staff meeting. That is perfectly acceptable to us. If you are asking about what the topics were that were discussed at the staff meeting, that is covered by functional immunity.

BY MR. WICK:

Q. I'm going move down to the, about two-thirds of the way down that first page, there is an entry dated February 2, 2020 and the subject line is interactions with civil society organization Beit Hanina Cultural Center Brooklyn on UN topics. Do you see that entry?

A. Yes.

Q. Where did that event take place?

A. In Brooklyn.

Q. I apologize if I am mispronouncing this. What is the Beit Hanina Cultural Center?

A. Civil society organization.

Q. What do you mean by a civil society organization?

A. It is a civil society organization

of the community, Palestinian-Americans, who were originally from Beit Hanina, which is a neighborhood in Jerusalem, who are residing in Brooklyn.

Q. And what is the purpose of the organization?

A. I don't really know. You have to ask, you know, the organizers of this organization. They are better qualified --

Q. To your knowledge, does the Beit Hanina Cultural Center have any connection to the United Nations?

A. So the work of the United Nations, many people might not know that it is not only diplomats, it is diplomats' involvement of civil society organization, involvement of the media, involvement of the missions, involvement of parliamentarians, involvement of so many sectors of different societies, because the way the UN operates, it invites so many different representations of different societies and countries that participate in the decision making process.

So, therefore, there are hundreds, maybe more than hundreds, civil society organizations that are accredited to the United Nations or --

THE COURT REPORTER: Excuse me, please.

The videographer, is there some way of correcting the audio between the witness and Mr. Berger because I'm having trouble with the witness cutting out and then Mr. Berger, when he speaks, there is a lot of echoing on my end.

THE VIDEOGRAPHER: We are now off the record. The time is 14:31 UTC time.

(Discussion held off the record.)

THE VIDEOGRAPHER: We are back on the record. The time is 14:36 UTC time.

BY MR. WICK:

Q. Dr. Mansour, before we had to go off the record, you were in the middle of an answer to my question. I had asked you whether the Beit Hanina Cultural Center had any connection to the United Nations and you were explaining that the United Nations involves multiple organizations.

Is there anything more that you

wanted to say?

A. No. Just, basically, I was saying the nature of work at the United Nations, it is so encompassing and exclusive that it allows for participation in the decisionmaking process to so many different players; representatives of countries, representatives of multicultural organizations, civil society organizations, media, parliamentarians, all components of society because the agenda of the UN, it involves humanity in so many different ways.

I will give an example. For example, when we debate climate change, that is not only the domain of diplomats, it is civil society admissions, activists, private sectors, all of them, they have a stake on this issue.

And the UN and the Secretary General and the General Assembly invite all those to contribute to that collective effort of all of us of how we view these issues and what we legislate.

So, therefore, everybody has something to contribute. So in this example, this civil society organization, the Palestinian-Americans, they feel that they have a role to influence those who are dealing with the question of Palestine at the UN with whatever they have in their mind.

Q. Does the Beit Hanina Cultural Center have any accreditation from the United Nations?

A. As far as I know, I don't really know. They may, they may not. I will just give an example. There are hundreds who are accredited civil society organizations. Some of them are Palestinian, some of them are Palestinian-American. Many of them are Jewish-American organization or Israeli organization.

Some of them, they go through the scrutiny of the Social and Economic Council to approve them as accredited civil society organization, who may be on the Exercise of the Inalienable Rights has its own mechanism of accrediting civil society organization, and there are hundreds of them that are accredited by that group. I am just giving you an example how things are at the United Nations, not only diplomats operating in a vacuum. We operate within the dynamics of what is happening, all of us.

Q. I understand that. To be clear, you don't know whether the Beit Hanina Cultural Center is accredited by the United Nations; correct?

A. I don't know.

Q. And what does it mean for a civil society organization to be accredited by the United Nations?

A. To be invited --

THE COURT REPORTER: I'm sorry, I did not hear the ending.

THE WITNESS: To be accredited, to be invited to events. For example, if you are an accredited women organization, there are so many conferences and events related to the rights of women. So then if you are accredited, you will be invited, you will listen to debates, you can contribute to debates, you can lobby for certain kind of resolutions and you are allowed to vote on these things, as an example.

MR. WICK: Let me put up Tab 16, please. I am going to ask that this document be marked as next in order, I believe Exhibit 5.

Nations, you will see big signs on the wall of the United Nations for the public to see how plastic is bad and eliminate plastic from use.

Q. So if you speak to an organization at a non-public event about the use of plastics, you would consider that part of your organization's functional immunity?

A. If they invite me on my capacity as Permanent Observer, Ambassador of the State of Palestine, and in my capacity as a previous chair of the Group of 77 and China, speak about plastic and its negative effect on our environment, that is within my exclusive domain in exercising my authority as observership activities as the Observer of the --

Q. Let's go to the next page, please. On the next page, there is, about a third of the way down, there's an entry dated March 26, 2021, interactions with civil society organization church group on UN topics.

Do you see that?

A. March 20 what?

Q. 6.

A. 26. Yes.

Q. And where did that event take place?

A. It was virtual for a church group in Orlando, Florida.

Q. Were you in your office at the Observer Mission at the time?

A. Yes.

Q. What was the name of the church group?

A. My wife belongs to that group. I cannot remember now the name, but it's a group that she belongs to in Orlando, Florida.

Q. What was the nature of the group?

A. They are a group that work for peace and justice in the Middle East.

Q. Okay. And does your wife's church have any connection to the United Nations?

A. No, it doesn't. But I can, again, tell you that faith-based organizations, almost all churches in the United States and worldwide, have Observers at the United Nations. There is a building across the street from the United Nations where there are so many representatives from these different churches, they represent them in the works of the General Assembly, and they are a key player in so many global issues in the agenda of the UN.

So, therefore, faith-based organizations are mainly churches, are very active and heavily involved in the affairs of the United Nations.

And as you may know, the state of the Vatican, as an Observer state seat in the General Assembly, as us, Observer Mission of the State of Palestine.

Q. A few lines down the page, there is an entry on April 16, interaction with civil society organization Boston College on UN topics.

Do you see that?

A. Yes.

Q. And was that also a virtual event?

A. Actually, that did not take place.

Q. It did not take place?

A. No.

Q. It was canceled?

A. This is the wrong thing on my agenda. I should have picked up that. But there was another college, it should be on the agenda, I think South -- South something -- Bridgewater. So that this is -- my secretary made a mistake. It just said Boston College.

that and I want to put that on the record, which is the very cover page of the calendar says that it is subject to claims of functional immunity and jurisdictional immunity. We put it in the public calendar because it's listed as a public event in the UN's public calendar.

MR. WICK: Thank you, Mr. Berger.

BY MR. WICK:

Q. Let's go to the next page. There is an entry, not quite halfway down, October 22, 2020, titled Zoom meeting with ADC. Do you see that?

A. Yes.

Q. And do you know what that entry is for?

A. Yes.

Q. What was that event?

A. It was an event with ADC, which is an accredited organization to the United Nations, the Anti-Discrimination Committee, about, you know, our work at the UN and discussions with those who participated from their side on this event. They invited me in my official capacity as the Ambassador of the

State of Palestine, Permanent Observer to the State of Palestine to the United Nations.

Q. We are going to show you a video that we will have marked as Exhibit 7, please.

(Deposition Exhibit No. 7 was marked for identification.)

(Video playing.)

BY MR. WICK:

Q. Dr. Mansour, do you recognize that as a video of the ADC meeting described in your October 22, 2020 calendar entry?

A. Yes.

Q. And where were you when you appeared at --

A. In this office.

Q. At your office at the Observer Mission?

A. Yes.

Q. We can go back to the calendar. What was the purpose of your appearance at the ADC event, Dr. Mansour?

A. It's, you know, talking about what we do at the United Nations, and whatever questions that they have related to our work, at that time, from the point of view of their audience or those who are participating in that event.

Q. Was one of those purposes to advocate for the Palestinian cause?

A. I was invited in my capacity as the Ambassador of the State of Palestine to the United Nations, and it is my duty to exercise my observership capacities at the United Nations.

So it is within that context, I was invited, and within that context, I shared with them our view and vision.

Q. I'm going to ask the question again because I don't think that I got a clear answer.

Was one of your purposes in speaking to the ADC to advocate for the Palestinian cause?

A. I always advocate to the Palestinian cause in my capacity as the Ambassador of the State of Palestine to the United Nations in carrying out my, and exercising my functions and responsibilities as an Observer of the United Nations.

Q. Just a moment, please. In the case

of the October 22, 2020 meeting, you were advocating for the Palestinian cause to the American Arab Anti-Discrimination Committee; correct?

A. I was advocating in my capacity and in my responsibility for those who were under the other end of the Zoom.

Q. And that was members of the ADC; correct?

A. I assume so. I don't know if they are members or what.

Q. There is another entry on November 14, 2020, speak at the first convention of Beit Sahour?

A. Sahour. Beit Sahour.

Q. Beit Sahour.

A. Yes.

Q. And what was that event?

A. This is another civil society organization for Palestinian-Americans. I believe it's in Michigan. And then they were organizing themselves, building an organization, and they invited me, in my capacity as the Ambassador of the State of Palestine to the United Nations, to say a few words of congratulating them on the occasion of their convention, and I shared with them what we do at the United Nations.

Q. And we have another video to show you, which we would like to mark as Exhibit 8.

(Deposition Exhibit No. 8 was marked for identification.)

(Video playing.)

BY MR. WICK:

Q. Dr. Mansour, do you recognize that as a video of the speech described on your November 14, 2020 calendar entry?

A. Yes.

Q. And you gave that speech virtually; correct?

A. That is correct.

Q. And where were you when you gave the speech?

A. In this office here.

Q. At the Observer Mission building?

A. That is correct.

MR. BERGER: May I please ask for clarification of the record, which is, you're showing very short clips of maybe eight or ten seconds. When you're asking if he and they want, just to say -- they invited me in my capacity as the Ambassador of the State of Palestine for the United Nations, and I obliged them.

Q. And was one of the reasons that you accepted the invitation and spoke to that group to advocate for the Palestinian cause?

A. Everything that I do in my capacity for the UN is advocating for the Palestinian cause.

Q. There is an entry on November 19, 2020 titled Seton Hall University virtual talk. What does that entry signify?

A. Yes. What date is that? November. Again, I was invited and it was done virtually through Speche, if I am not mistaken, it might be the political science department or something to do with international law, Seton Hall University.

Again, academia and universities are key components of the work of the United Nations. I talk about Model UN on part of it and the other part, what they teach, they teach, you know, concrete issues.

I was a teacher and I used to teach

issues related to the agenda of the UN, and they wanted to know what we do at the United Nations in trying to find a peaceful solution to this conflict.

I obliged them and I spoke on that subject related to my work at the UN.

Q. All right. We would like to show you another video which we will mark Exhibit 9, an excerpt from a video.

(Deposition Exhibit No. 9 was marked for identification.)

(Video playing.)

BY MR. WICK:

Q. Dr. Mansour, do you recognize that excerpt as an excerpt from a video of the talk described in your November 19, 2020 calendar entry?

A. I do.

Q. Was that a talk given to university students or college students in the United States?

A. Yes.

Q. And where were you when you gave the talk?

A. In my office in the Observer Mission

of the State of Palestine, United Nations.

Q. And was one of the purposes of accepting that invitation and giving that talk to advocate for the Palestinian cause?

A. As I said before, when I am invited in my capacity as the Observer, Ambassador of the State of Palestine for the United Nations, I, you know, speak in that capacity on the advancing the cause of the Palestinians and United Nations.

Q. The next entry is November 23, 2020 -- not the next entry -- well, it is the next entry. It states, bureau meeting. Do you see that entry?

A. Yes.

Q. Do you know what that means?

A. Yes.

Q. What is the bureau being referred to?

A. It is the Bureau of Committee on the Exercise of the Inalienable Rights of the Palestinian People, it is a General Assembly committee.

Q. Last item on the page, December 10, 2020, titled, all I want for Christmas is a

Bridgewater State event?
A. I don't know if it was on that day. I remember, for that university, dates changed more than one time, and it could be that function on April 6, not on that date previously.
Q. Okay. I would like to show you a video that we would like to have marked as Exhibit 10.
(Deposition Exhibit No. 10 was marked for identification.)
(Video playing.)
BY MR. WICK:
Q. Dr. Mansour, do you recognize that as an excerpt from a video of, or a speech to Bridgewater State University as reflected in your calendar entry?
A. Yes.
Q. This is the April 6, 2021 entry that we have been discussing, Palestinian affairs and the Biden administration?
A. I believe so.
Q. And you were speaking to U.S. college students in that speech; correct?
A. And professors.

Q. And professors. And where were you when you gave the presentation?

A. My office at the Observer Mission of the State of Palestine, United Nations.

Q. And was one of the purposes of that speech to advocate for the Palestinian cause?

A. Again, as I said, you know, universities are a key component of the decisionmaking process at the United Nations. And universities also have programs, study issues on the agenda of the UN, including the question of Palestine.

So when they invite me, they invite me in that capacity, and they ask me questions as it relates to their education, to their students, about how the United Nations is with the Palestine question.

Q. And was one of the purposes of that speech to advocate for the Palestinian cause to those students and professors?

A. Again, as I said, everything that I do in my capacity as Permanent Observer of the State of Palestine to the United Nations is to advocate for justice for the Palestinians on the basis of the UN charter and UN resolutions --

THE COURT REPORTER: I'm sorry, Doctor, you cut out again at the end.

THE WITNESS: At the end, I said that on the basis of international law and relevant UN resolutions.

BY MR. WICK:

Q. On -- the next item I would like to ask about is May, the very bottom, May 6, 2021, informal active dialogues with the candidates. And if we scroll to the next page, you will see an identical entry for May 7, 2021.

Do you see those two entries?

A. Yes.

Q. What was that event?

A. You know, another aspect of the work of the United Nations. Many countries run for offices. For example, every year we have five countries running for seats in the Security Council. So the candidates, they lobby countries or groups so that they can get their votes and to win a seat in the Security Council.

Also, we have elections for judges of international corporate justice. Countries

What do I discuss with their members, let's say, who are running for seats in the Security Council? That we are active in the agenda of the Security Council. There is discussions of issues related to us in the Security Council, specifically, so then they have to prove to me that they will be objective, guided by the principles of the charter, UN resolutions, international law, when these issues are discussed in the Security Council in order to get my approval and support for them and their candidature -- in the business of the UN.

Q. Did you ask any questions of the candidates?

A. Most likely, yes, but I don't recall. It's a general discussion, you know, and these candidates, there are so many of them, covering so many different issues from the Security Council, Human Rights Council, so many other positions.

Q. There is an entry on May 19, 2021 titled, interview with Morning Joe on MSNBC. You were interviewed that day, you were interviewed live on the Morning Joe program;

correct?

A. That is correct.

Q. As you might guess, we are going to show you an interview, or a video, excuse me, that we would like to mark as Exhibit 11. We will show you an excerpt from the interview.

(Deposition Exhibit No. 11 was marked for identification.)

(Video playing.)

BY MR. WICK:

Q. Dr. Mansour, do you recognize that as an excerpt of a -- of your interview with the Morning Joe program notated on your calendar for May 19, 2021?

A. I do.

Q. And where were you when you gave that interview?

A. In my office in the Observer Mission of the State of Palestine to the United Nations.

Q. Where you are sitting right now; correct?

A. Correct.

Q. And you were speaking in that interview to the American public; correct?

A. I was speaking to Joe and the lady who is the co-anchor woman and through them, I guess, to their audience.

Q. And was one of the purposes of giving that interview to advocate for the Palestinian cause?

A. The purpose of -- the main purpose of that speech was to exert all efforts possible to have a cease fire, stop the war that was waging against the Palestinian people in the occupied territory, particularly in the Gaza Strip.

And that is -- was a discussion in the Security Council at that time and consultation with all members of the Security Council, all members, including the P-5, in order to bring about a cease fire as soon as possible. That was the main objective of that interview, which is, in my capacity as the Permanent Observer of the State of Palestine to the UN, is to do everything possible within the Security Council, within the United Nations, and the entire international community, to bring a quick cease fire and put an end to that tragedy to save lives.

Q. Next, May 22, 2021, there is an entry for Al Jazeera interview. Do you see that?
A. May what, 20?
Q. May 22, 2021?
A. I see it.
Q. Does that entry reflect you were interviewed by Al Jazeera on that date?
A. Yes.
Q. I want to show you a video marked as Exhibit 12.
(Deposition Exhibit No. 12 was marked for identification.)
BY MR. WICK:
Q. Do you recognize Exhibit 12 as an excerpt from a video of your interview with Al Jazeera that's reflected in your calendar on May 22, 2021?
A. That is correct.
Q. And where were you when you gave that interview?
A. My office. In --
Q. In the Observer Mission?
A. Observer Mission of the State of Palestine to the United Nations.

Q. Where you're sitting right now; correct?

A. Correct.

Q. And was one of the purposes of giving that interview to advocate for the Palestinian cause?

A. The main purpose of that interview is to show what was happening in the Security Council in our efforts to have a cease fire, immediate cease fire to the battle that was waging at that time and to save lives of civilians, particularly children in which 66 of them were killed in the Gaza Strip during that aggression.

Q. Then on May 25, 2021, there is an entry, virtual farewell meeting with ICC prosecutor.

Do you see that?

A. Yes.

Q. What was that event?

A. We are -- it is an event to say goodbye to Madam Bensouda, who is the prosecutor of the ICC, she finished and, you know, members of the ICC and we are a state party member and, in fact, we sit on the Bureau

1:40?

MR. BERGER: Very good. Thanks.

THE VIDEOGRAPHER: We are now off the record. The time is 1641 UTC time.

(At 12:41 p.m., a lunch recess was taken.)

THE VIDEOGRAPHER: We are back on the record. The time is 1743 UTC time.

BY MR. WICK:

Q. Good afternoon, Dr. Mansour. I want to go back to the Observer Mission building. You indicated the Observer Mission owns that building. To be clear, the Observer Mission has owned that building at all times since January 4, 2020; is that correct?

A. I am sorry, can you repeat the question, please?

Q. Yes. The question is, has the Observer Mission owned the Observer Mission building at all times since January 4th of 2020?

A. That is correct.

Q. I'm going to return to Exhibit 2 from very early in the deposition. As I

C E R T I F I C A T E

- - -

I, DR. RIYAD MANSOUR, do hereby certify that I have read the foregoing transcript and it is a true and correct copy of my deposition, except for the changes, if any, made by me on the attached Deposition Correction Sheet.

____

____

Date

ERRATA SHEET

PAGE	LINE	REASON FOR CHANGE/CORRECTION
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____
____	____	____

COMMONWEALTH OF PENNSYLVANIA)
) SS
COUNTY OF ALLEGHENY)

CERTIFICATE

I, Karen A. Nickel, a notary public in and for the Commonwealth of Pennsylvania, do hereby certify that the witness, DR. RIYAD MANSOUR, was by me first duly sworn to testify the truth, the whole truth, and nothing but the truth; that the foregoing deposition was taken at the time and place stated herein; and that the said deposition was recorded stenographically by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witness.

I further certify that I am not a relative, employee or attorney of any of the parties, or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 12th day of July 2021.

Karen A. Nickel, Notary Public
Registered Professional Reporter
Certified Realtime Reporter

Exhibit 2

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

- - -

SHABTAI SCOTT SHATSKY, individually and as personal representative of the Estate of Keren Shatsky, J ANNE SHATSKY, individually and as personal representative of the Estate of Keren Shatsky, TZIPPORA SHATSKY SCHWARZ, YOSEPH SHATSKY, SARA SHATSKY TZIMMERMAN, MIRIAM SHATSKY, DAVID RAPHAEL SHATSKY, GINETTE LANDO THALER, individually and as personal representative of the Estate of Rachel Thaler, LEOR THALER, ZVI THALER, ISAAC THALER, HILLEL TRATTNER, RONIT TRATTNER, ARON S. TRATTNER, SHELLEY TRATTNER, EFRAT TRATTNER, HADASSA DINER, YAEL HILLMAN, STEVEN BRAUN, CHANA FRIEDMAN, ILAN FRIEDMAN, MIRIAM FRIEDMAN, YEHIEL FRIEDMAN, ZVI FRIEDMAN, and BELLA FRIEDMAN, Plaintiffs, against	Case No. 18-Civ. 12355 CONFIDENTIAL VIRTUAL VIDEOTAPED DEPOSITION OF NADIA GHANNAM

THE PALESTINE LIBERATION ORGANIZATION and THE PALESTINIAN AUTHORITY (a/k/a "The Palestinian Interim Self-Government Authority" and/or "The Palestinian National Authority"),)

Defendants.)

- - -

VIRTUAL VIDEOTAPED DEPOSITION OF NADIA GHANNAM, witness herein, called by the Plaintiffs, for examination, taken pursuant to the Federal Rules of Civil Procedure, by and before Karen A. Nickel, a Certified Realtime Reporter and a notary public in and for the Commonwealth of Pennsylvania, held remotely with all parties appearing from their respective locations, on Friday, July 23, 2021, at 9:30 a.m.

COUNSEL PRESENT:

For the Plaintiffs:
Ronald F. Wick, Esq. (Admitted Pro Hac Vice)
Cohen & Gresser, LLP
2001 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20006

Stephen M. Sinaiko, Esq.
Cohen & Gresser, LLP
800 Third Avenue
New York, NY 10022

For the Defendants:
Mitchell R. Berger, Esq.
Joseph Alonzo, Esq.
Salim Kaddoura, Esq.
Squire Patton Boggs
2550 M Street NW
Washington, DC 20037

Also Present: Cosette Vincent
Eszter Vincze

- - -

I N D E X

WITNESS	PAGE
Nadia Ghannam	
By Mr. Sinaiko	6

E X H I B I T S

NUMBER	DESCRIPTION	PAGE
Exhibit 1	Notice of Deposition	19
Exhibit 2	LinkedIn Profile	29
Exhibit 3	Mission Personnel List	60
Exhibit 4	Planner	71
Exhibit 5	Privilege Log	81
Exhibit 6	Tweet	155
Exhibit 7	Tweet	158
Exhibit 8	Tweet	162
Exhibit 9	Tweet	167
Exhibit 10	Tweet	168
Exhibit 11	Tweet	170
Exhibit 12	Tweet	173
Exhibit 13	Tweet	174
Exhibit 14	Tweet	176
Exhibit 15	Tweet	179
Exhibit 16	Tweet	182
Exhibit 17	Tweet	184
Exhibit 18	Tweet	187
Exhibit 19	Tweet	194
Exhibit 20	Tweet	195
Exhibit 21	Tweet	197
Exhibit 22	Tweet	199
Exhibit 23	Tweet	200

P R O C E E D I N G S

THE VIDEOGRAPHER: Good morning, everyone. We are now on the record. Participants should be aware that this proceeding is being recorded and, as such, all conversations held will be recorded unless there is a request and agreement to go off the record.

This is the remote video-recorded deposition of Nadia Ghannam. Today is Friday, July 23, 2021. The time is now 13:31 UTC time.

We are here in the matter of Shatsky versus PLO. My name is Corey Wainaina, remote video technician on behalf of US Legal Support located at 90 Broad Street, New York, New York. I am not related to any party in this action, nor am I financially interested in the outcome.

At this time, will the reporter, Karen Nickel, on behalf of US Legal Support, please enter the statement for remote proceedings into the record.

THE REPORTER: The attorneys participating in this deposition acknowledge that I am not physically present in the deposition room and that I will be reporting this deposition remotely.

They further acknowledge that, in lieu of an oath administered in person, the witness will verbally declare her testimony in this matter is under penalty of perjury.

The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting. Please indicate your agreement by stating your name and your agreement on the record.

MR. SINAIKO: My name is Steve Sinaiko. I'm with Cohen & Gresser, LLP, in New York City. I'm here on behalf of the Plaintiffs today, and on behalf of the Plaintiffs, I agree.

MR. BERGER: This is Mitchell Berger from Squire Patton Boggs, Washington, D.C., on behalf of the Defendants, and we agree.

NADIA GHANNAM, a witness herein, having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. SINAIKO:

Q. Before we get started, I think there

is a little bit of difficulty hearing Ms. Ghannam when she speaks. There is a little bit of a delay, I think.

A. Can you hear me now?

Q. Better. Still, the video and the audio aren't synced. I guess that's not such a big deal. Do you want to try one more time?

A. Can you hear me now?

Q. It's okay. All right.

MR. SINAIKO: Before we get started, I have one housekeeping matter that I would like to just take up with Mr. Berger.

Mr. Berger, I take you and Ms. Ghannam are in your office in Washington, D.C. now; is that correct?

MR. BERGER: That is correct.

MR. SINAIKO: Okay. And you understand that our court reporter for today, Ms. Nickel, is in Pittsburgh, Pennsylvania; correct?

MR. BERGER: I do. I didn't realize I would get to be examined. This is wonderful.

MR. SINAIKO: I'm just -- I'm just confirming that we all understand what the facts are. I'm not trying to examine -- I mean, yeah, I guess maybe I am a little bit. That's fine. It's what I do.

So I just want to ask that the Defendants confirm, pursuant to Rule 30(b)(4) of the Federal Rules of Civil Procedure, that today's deposition can be taken by video conference as we are proceeding.

MR. BERGER: On behalf of Defendants, we so agree.

MR. SINAIKO: And pursuant to Rule 29 of the Federal Rules of Civil Procedure, do the parties also stipulate that, although Ms. Ghannam and you are in Washington, D.C. and Ms. Nickel is located in Pennsylvania, obviously not the same state, that Ms. Nickel is an appropriate officer before whom this deposition can be taken?

MR. BERGER: Yeah, on behalf of Defendants, we so agree.

MR. SINAIKO: Great. So everybody has so stipulated and we can get started.

BY MR. SINAIKO:

Q. Good morning, Ms. Ghannam.

A. Good morning.
Q. Thank you for being here today. As I said a moment ago, my name is Steve Sinaiko. I am with the law firm of Cohen & Gresser, LLP, in New York City, and I represent the Plaintiffs in this lawsuit.
Have you ever had your deposition taken before?
A. No.
Q. Okay. So what I would like to do at the outset is just go over a couple of basic ground rules so that everybody is on the same page about how things are going to unfold today. Would that be all right?
A. Yes.
Q. Okay. You remember that a moment ago you took an oath to tell the truth?
A. Yes.
Q. And I'm going to be asking you a series of questions today. Obviously, you have taken an oath so your answers to those questions are under penalty of perjury; do you understand?
A. Yes.
Q. Okay. And there is a court reporter

here, Ms. Nickel. She is going to be transcribing everything that we say today. So to make sure that the record is accurate, and especially since the deposition is taking place remotely by video conference in light of the COVID-19 pandemic, it is important that you and I not speak over each other and that only one person speak at a time. So I would ask that you wait until I finish my questions before you start answering them and, for my part, I will try to wait until you finish your answers before I put another question.

Is that okay?

A. Yes.

Q. Okay. Another important point here is it's necessary for you to respond to my questions verbally rather than with nods of the head or gestures or otherwise because only verbal responses can be transcribed.

Is that all right?

A. Yes.

Q. Okay. And if you don't understand one of the questions that I ask you, let me know, and I will try to rephrase or clarify. But understand that the Court is going to assume and the lawyers in the room are going to assume that you have heard and understood every question that I ask you today to which you respond.

Do you understand?

A. Yes.

Q. Okay. There may come moments during the proceeding today when your lawyer, Mr. Berger, objects to one of my questions, but unless Mr. Berger instructs you not to answer a question, you should go ahead and answer the question notwithstanding any objections.

Do you understand?

A. Yes.

Q. Okay. I may take periodic breaks during the deposition, and if you need a break, let me know and I will do my best to accommodate. But I would ask that, if a question is pending, that you answer the question before we take a break.

And I understand, Mr. Berger, you know, that questions are privileged, you know, we can -- you can go off the record if there is a question of privilege that you want to discuss with Ms. Ghannam. But apart from that, to the Palestinian Authority and the Palestine Liberation Organization.

Do you understand?

A. Yes.

Q. Okay. And I will, from time to time, refer to the Palestinian Authority as the PA, so if I refer to the PA, that means the Palestinian Authority; is that all right?

A. Yes.

Q. I will also be referring to the Palestine Liberation Organization from time to time as PLO. So if you hear a question that has PLO, will you understand that that's a reference to the Palestine Liberation Organization?

A. Yes.

Q. Okay. And at times in questions I will refer to the Observer Mission, and by that I mean the Permanent Observer Mission of the State of Palestine to the United Nations, which is a little bit of a mouthful, but will you understand that?

A. Yes.

MR. SINAIKO: Okay. Cosette, can we put up tab No. 1, please?

(Deposition Exhibit No. 1 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, are you able to see Tab No. 1 on the screen in front of you?

A. No.

MR. SINAIKO: Okay. Can we arrange for Ms. Ghannam to see the document that's on the screen?

MR. BERGER: I have it on my laptop. Let me show it to her.

MR. SINAIKO: That would be great.

MR. BERGER: This is the Notice of Deposition.

THE WITNESS: Okay.

BY MR. SINAIKO:

Q. Are you able to see the document that Cosette just put up?

A. Yes.

MR. SINAIKO: Okay. Karen, can we mark that as Deposition Exhibit No. 1?

THE COURT REPORTER: Yes.

BY MR. SINAIKO:

Q. And have you seen this document

before today?

A. Yes.

Q. And what do you understand this document to be?

A. That I would be making a deposition today.

Q. Right. I will just represent to you that this is the Notice of Deposition that the Plaintiffs issued to the Defendants in this case and ask you whether it's your understanding that you're here testifying today pursuant to this notice?

A. Yes.

Q. All right. And let me ask you further whether you did anything in advance of today to prepare for your deposition today.

A. I just met with my attorney.

Q. Okay. And did you do anything other than meeting with your attorney?

A. No.

Q. Did you look at any documents in anticipation of your testimony here today?

A. Yes.

Q. And when did you -- well, let me ask you -- withdrawn.

Let me ask you what documents you looked at in anticipation of your testimony here today.

A. This particular notice and a few documents that were presented to me by my attorney. I don't recall what they are exactly called, but paperwork that was given to me by my attorney.

Q. Okay. Maybe you could describe to me, even if you don't know what they are called, describe to me the nature of the documents that your attorney showed to you?

MR. BERGER: I'm going to object and instruct the witness not to answer the question on the grounds of attorney-client privilege the way you have it. Your first question about if she recalls any documents that she reviewed is fine with me.

MR. SINAIKO: And she can't describe the documents to me?

MR. BERGER: Can you describe to him what documents, if any, you reviewed to prepare for your deposition beyond what you have already given him?

THE WITNESS: There was a

paper with the names of the employees at the Mission at the United Nations, and something that I signed regarding my place of employment. What I recall.

BY MR. SINAIKO:

Q. Did you look at any transcripts of other depositions in this case?

A. Oh, yes, I did.

Q. And which transcripts did you look at?

A. I looked partially at Ambassador Mansour's transcript prior to my fall, and that was the end of that. And I literally looked at only a few pages of it.

Q. And those are documents that your lawyers showed you?

MR. BERGER: Object to the form of the question. Calls for attorney-client information. Instruct the witness not to answer.

MR. SINAIKO: On what basis? Where she got the documents is not -- that's a fact. That's not privileged. If I ask her what documents you showed her, that's not a privileged question. She can answer that.

MR. BERGER: It is.

MR. SINAIKO: I don't understand, Mitch. Why are you doing this? This is obstructing.

MR. BERGER: It is not obstructing. It's preserving attorney-client privilege. If you want to agree that her answer to that question won't be argued as a waiver of attorney-client privilege, I'll let her answer.

MR. SINAIKO: Fine. We're not going to argue that it's a waiver of attorney-client privilege, but it's not privileged at all. That's our view. But fine, we won't argue that it's a waiver.

MR. BERGER: You can answer.

MR. SINAIKO: Wait. Let's get the question back so that the witness has it. Can you read it back, Karen?

(Reporter read back previous question.)

THE WITNESS: Yes.

BY MR. SINAIKO:

Q. Okay. Apart from these documents you signed related to your employment and the paper with the names of employees and the transcript of Dr. Mansour's deposition, did you look at any other documents in anticipation of your testimony here today?

A. Just my calendar.

Q. Okay. Anything other than the calendar, plus the other three documents I just mentioned?

A. No.

Q. Okay. And you mentioned a moment ago that, in addition to looking at these documents, you met with your lawyer. Who did you meet with exactly?

A. Mitch.

Q. Mr. Berger?

A. Mr. Berger, yes.

Q. Anyone other than Mr. Berger?

A. No.

Q. Okay. And on how many occasions did you meet with Mr. Berger?

A. We met twice. Twice, I believe.

Q. And when was the first time you met with Mr. Berger in anticipation of your deposition here today?

A. I don't remember the date. I don't

know.

Q. I mean ballpark, can you say how long ago it was, roughly?

A. Two days -- maybe a week ago.

Q. Okay. And when was the second time?

A. This is Friday -- Monday.

Q. Monday of this week?

A. Yeah.

Q. Okey-doke. And the first meeting, the one that happened earlier in time, what was the duration of that meeting?

A. I can give you an approximate, maybe two to three hours.

Q. And the meeting on Monday, what was the duration of that one?

A. Maybe two hours.

Q. Okay.

A. Along those lines.

Q. And just for clarity, the only person in attendance at those meetings was Mr. Berger, just Mr. Berger and you; correct?

A. Yes.

Q. And in anticipation of your deposition today -- let me withdraw that.

In advance of your deposition today,

apart from counsel, did you speak to anybody about your deposition?

A. Just my husband.

Q. Did you speak with any of your colleagues at the Observer Mission relating to your deposition in advance of today?

A. No. I spoke to no one else.

Q. So you didn't talk to Dr. Mansour about your deposition in advance of today?

A. I haven't heard from Dr. Mansour in quite a while. No.

Q. And you didn't speak with Ambassador Abdelhady-Nasser in advance of today about your deposition?

A. We just texted each other. I texted her yesterday morning saying good luck. And then she did the same last night. And I did text her late at night last night telling her about the fall and that I was really worried that I broke my ankle, and it was really more along the lines of should I go to the hospital.

She just told me, you know, these people are thoughtful, if you feel like you have to reschedule, reschedule. And then it was the agreement that I would move forward because I wanted -- I don't want to delay this anymore. That was the extent of it, and she just wished me luck.

Q. Okay. And apart from these communications you just described for me, have you communicated with anybody else?

A. Just my husband.

Q. Concerning your deposition. Just your husband. Okay.

A. Yeah.

Q. Okay. Did you bring any documents with you today to your deposition?

A. No.

Q. Okay.

A. No.

Q. And in advance of today, have you ever testified at a trial?

A. No.

Q. Have you ever testified at any sort of proceeding, like an arbitration?

A. No.

Q. Okay. Are you a citizen of the United States, Ms. Ghannam?

A. Yes.

Q. Are you a natural born citizen of

the United States?

A. I'm sorry, am I what?

Q. A natural born citizen of the United States.

A. Yes. I was born in the States.

Q. And where do you currently reside?

A. I live in Riverdale, New York. It's a community in the Bronx.

Q. Excellent. And have you resided at the same place in Riverdale at all times on and after January 4, 2020?

A. I don't -- well, it's kind of complicated how you describe the word "resided." I had to leave New York in March because of COVID. As I mentioned, my husband is working in a COVID clinic, and the fact that I have MS made us both worried that I would get the virus and it would put me in a very dangerous situation.

So I took my two small children and left New York and came to Washington.

Q. Okay.

A. And I stayed quite a while.

Q. Okay. So you are currently residing in Washington, D.C.?

A. Well, again, I don't know what your definition of "residing." I do go back and forth to New York.

I mean, my belongings, my mail, everything goes to New York, but I am here, again, for the safety -- for safety of me and my children for now. But I do plan to go back to New York permanently in September.

Q. Understood. So there is a place in New York where you have been staying, you know, for stretches of time since the COVID pandemic took hold?

A. Correct. My home.

Q. Okay. So apart from the place in Washington where you have been staying from time to time during the COVID pandemic and your home in Riverdale, have there been any other places where you have spent time, you know, on and after January 4 of 2020?

A. No.

MR. SINAIKO: Okay. Why don't we take down Exhibit 1, Cosette, and put up Tab No. 2.

(Deposition Exhibit No. 2 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, can you see the document that we have put up on the screen?

A. Yes.

MR. SINAIKO: Okay. And Karen, can you mark this as Deposition Exhibit No. 2, please.

THE COURT REPORTER: Yes.

BY MR. SINAIKO:

Q. Ms. Ghannam, you have seen this document before; correct?

A. When I first opened the account years ago, yes.

Q. Okay. And what do you recognize this document to be?

A. This was my first LinkedIn account.

Q. I got it. And let me ask, you know, let me ask, or let me give you just a -- one other sort of point about ground rules. I'm going to be showing you documents, and because we are doing the deposition remotely, typically, we will show you the documents on a screen like this, but if you ever want to see other parts of a document or you want the pages turned so that you can look at different parts, just let us know and Cosette, who is helping us here, she'll do -- you know, she'll turn the pages in whatever way you want -- I mean, just because I want to be sure that you have the opportunity to look at the documents that we put in front of you during the deposition in any way that you feel you need to.

Is that okay?

A. Yes.

MR. BERGER: And I'm sure you'll call her attention to any specific part that you want her to look at.

MR. SINAIKO: Of course. I mean, I just don't want her to feel that she is unable to look at any parts of these documents she wants to. You know, she should just ask and that's fine.

BY MR. SINAIKO:

Q. Okey-doke. So you said a moment ago that you recognized this to be your LinkedIn profile?

A. My first LinkedIn profile. There should be probably two virtually somewhere.

Q. So there are other -- there are other LinkedIn profiles for you?

A. There is another one, yes.

MR. SINAIKO: Okay. Cosette, can we turn to the second page of this document? Okay.

BY MR. SINAIKO:

Q. Do you see, on the page, on Page 2 of your first LinkedIn profile, that there is a section that's called education?

A. Yes.

Q. Okay. And you see the first entry there is George Mason University?

A. Yes.

Q. And do you see that it says, Bachelor of Arts underneath that, Bachelor of Arts, BA, International Studies and History?

A. Yes.

Q. Did you, in fact, receive a Bachelor of Arts in International Studies and History from George Mason University?

A. Yes.

Q. And when did you receive that degree?

A. I was Class of '99.

Q. Class of '99. And let's look at the next entry below. You see it says, the Johns

Hopkins University?
A. Yes.
Q. And underneath that, it says, Master of Arts, MA, Public and Media Relations and Political Communications?
A. That is correct.
Q. And is it, in fact, the case, that you received an MA in Public and Media Relations and Political Communications from the Johns Hopkins University?
A. That is correct.
Q. When did you receive that degree?
A. I don't remember what year it was in. That was a little complicated.
Q. Okay.
A. I took some time off during that. My brother was sick with cancer. So I ended up doing that program part-time, but I don't remember what year I actually physically graduated in.
Q. Understood. But at some point subsequent to 1999, you received the degree from Johns Hopkins?
A. Oh, yes.
Q. Okay. And apart from the degree you

received from George Mason University and the degree you received from Johns Hopkins University, do you hold any other academic degrees?

A. No.

Q. Do you hold any professional certifications?

A. When I worked in banking, I used to get all sorts of certifications in banking and finance, but I don't recall. That was so long ago.

Q. Okay.

A. But I remember I used to go down south and take a lot of courses.

Q. Do you hold any professional licenses as you sit here today?

A. No.

Q. Okay. To your knowledge, have you ever held a professional license?

A. No.

Q. All right. Looking up above the education section on Page 2 of this document, we have marked as our second Deposition Exhibit, and I know it's your older or your initial LinkedIn profile, I see there are two references, one to First Virginia Bank and one to BB&T?

A. Uh-huh, yes.

Q. And looking at those entries, can you tell me, you know, were those the first two jobs you had after college?

A. After college, yes.

Q. Okay. So it's accurate, then, that after you graduated from George Mason University, you were in banking from 1999 through 2007?

A. Yes.

Q. Okay. And above that, on Page 2 of this LinkedIn profile, you see there is an entry that says, television host?

A. Yes.

Q. Can you tell us what that refers to?

A. I was a co-host on a TV show on ART network.

Q. And what is ART network?

A. Arab Radio & Television.

Q. And you did that from June of 2004 to April of 2007; correct?

A. That's what's written, yes.

Q. By the way, this LinkedIn profile

that we're looking at, this is something that you wrote; correct?

A. Yes.

Q. And when you wrote it, you intended for it to be accurate; correct?

A. Yes.

Q. Okay. I notice there is a gap on the -- there is a gap in the LinkedIn profile between April of 2007 and June of, it looks like June of 2008 up above in the entry for Palestinian Diplomatic Missions to the United Nations; do you see that?

A. Yes.

Q. And what did you do during that time?

MR. BERGER: It doesn't say United Nations.

THE WITNESS: Not United Nations.

BY MR. SINAIKO:

Q. I'm so sorry. I apologize. I misread that. It says, Palestinian Diplomatic Mission to the United States.

A. Yes. So I took a sabbatical from work because my little brother was diagnosed with leukemia. And as a child of immigrant parents, their English was very limited, so I would take my brother for treatment to Johns Hopkins University and essentially took care of my brother. I didn't work.

Q. I understand. So your next job, after being a television host at ART, was working as director of public relations and outreach at the Palestinian Diplomatic Mission to the United States?

A. Yes.

Q. Okay. And how long did you hold that position?

A. I don't remember when I left. Maybe -- I got married in 2015. I believe I left in 2016, so you can do the math. I'm not sure.

I'm a very visual person. That's just the way I work and function. So with numbers, it's hard for me. I have to, like, see them in front of me.

But I just know I got married in 2015 and then I got pregnant in 2016. I had my son in the Washington area, and then I moved down to New York.

So I left -- I believe it was

October 2016.

Q. And what did you do after that?

A. No, no. Wait a second. '17. [redacted] was born in 2017. Excuse me. That's what I mean, how you have to see things.

I terminated my position. I quit at the Mission in Washington. And I applied for new employment at the Diplomatic Mission to the United Nations.

Q. Okay. And do you recall when you started at the Diplomatic Mission to the United Nations?

A. I do, oddly. It's one date I remember. I believe my first day was November 16 -- it was a Monday -- because I hate New York. And it was 2000 and -- say 2017.

Q. So in November of 2017, you began work at the Palestine -- at the Observer Mission?

A. Yes. I became -- I started a new job at the UN Observer Mission, correct.

Q. Okay. And did you have the same title when you moved to the Observer Mission that you previously had at the Palestinian Diplomatic Mission to the United States?

Q. Okay. And so do you, typically, record the names of the participants of meetings in your planner when you regard that information as important?

A. If Ambassador Mansour is speaking, yes, I do.

Q. What about Ambassador Abdelhady-Nasser?

A. Yes.

Q. What about other people from the Observer Mission, would you record that?

A. Yes. Anyone that would be speaking. But, typically, no one else speaks other than those two. It's rare.

Q. Okay. By the way, you mentioned a moment ago you might have been tweeting during this meeting that we've been talking about from October 7. You know, how frequently would you say you tweet on the Observer Mission's Twitter account?

A. Very frequently.

Q. Do you think that's a daily occurrence?

MR. BERGER: This is after January 4, 2020?

MR. SINAIKO: You know, let me put the question with that limitation in it just so we have a clear record.

BY MR. SINAIKO:

Q. On and after January 4, 2020, how frequently would you say that you have posted tweets on the Observer Mission's Twitter account?

A. I would say very frequently, but it would depend on how busy my workload is.

Q. Okay.

A. Sometimes more than others. And also depending on what's happening in the world.

Q. Okay. Again, during the period, you know, on and after January 4, 2020, how many times a day would you say on average you post tweets to that account, that is, the Observer Mission account?

A. If I had to take a guess, on average, on average, once.

Q. Okay.

A. On average.

Q. Okay. That's fine. Let's go to Page 2053. And Ms. Ghannam, if you can just

THE COURT REPORTER: I'm sorry, I did not hear the answer. It got cut out.

THE WITNESS: I said, occasionally, Dr. Riyad or Ambassador Feda might make suggestions as to what I should post.

BY MR. SINAIKO:

Q. Anybody else?

A. No.

Q. Does anybody other than members of the staff of the Observer Mission, and that is the people on the list that we had showed you before, provide input into the content of material to be posted on the Observer Mission Twitter and Facebook accounts?

A. No.

Q. Okay. So, for example, nobody from -- nobody from -- well, withdrawn.

For example, nobody based in Ramallah provides input into the material that gets posted on those accounts?

A. Absolutely not.

Q. Okay. And just to be clear as to time frame, at all times on and after January

4, 2020, you have been the person who made all of the posts to the Observer Mission's Facebook and Twitter accounts; correct?

A. That is correct.

Q. And before you make these posts, are they approved by anybody other than you?

A. No.

Q. Now, taking just the Facebook account for a moment, are you familiar with -- well, right. Are you familiar with the privacy restrictions that can be placed on Facebook accounts?

A. Somewhat.

Q. Are you aware that it's possible to restrict a Facebook account so that the general public cannot see everything that's posted in an account?

A. Yes. Yes.

Q. Are there any such restrictions on the Facebook account that the Observer Mission operates?

A. No.

Q. So it's the case, then, that any member of the public can see anything that is posted on that account; correct?

A. Correct.
Q. Anywhere in the world?
A. Yes.
Q. So anyone, any person in the United States with access to the Internet and a Facebook account would be able to see those posts; correct?
A. Yes. I have never changed the privacy setting since I started working there.
Q. Okay. Now, this -- you probably know this better than I do because you are the media affairs person; is it possible to create similar restrictions with respect to a Twitter account?
A. That is a good question. I don't think so.
Q. Okay. So, to your knowledge --
A. No.
Q. To your knowledge, any person with access to Twitter can see anything that the Observer Mission posts on its Twitter account?
A. Yes.
Q. Okay. So as far as you know, the information that you post to the Observer Mission's Twitter account goes to the public at

large; correct?

A. Yes.

Q. Would it be fair to say that you regard it as important that the Observer Mission's Facebook and Twitter account postings get the broadest possible distribution?

A. Yes.

Q. And the Twitter and Facebook account postings that you make to the accounts that are maintained by the Observer Mission, are those accounts -- are those postings ever in a language other than English?

A. Yes.

Q. How frequently are there postings that are not in the English language?

A. Very, very, very infrequently.

Q. Very infrequently?

A. Correct.

Q. So would you say that in excess of 90 percent of the postings on the Observer Mission's Facebook and Twitter accounts are in the English language?

A. If not more, yes.

Q. Okay. And, again, this will be a question I'm asking you because you probably

UN resolutions, and it's illegal in nature.

And yes, therefore, it was in the framework of my work to disseminate information within the context of the United Nations.

Q. Right. And disseminating the view of the Observer Mission that activity relating to Sheikh Jarrah is illegal is an important part of your work at the Observer Mission; correct?

A. Yes, because part of my work is to elevate the messaging of the United Nations. That's part of my work as the media advisor.

Q. Well, let me ask this. Isn't it to elevate the work of the --

A. In the United Nations because it's not just the Permanent Observer Mission of the State of Palestine that ties onto these documents. There are many countries that are in agreement. I mean, many.

I mean, if you log onto Security Council meetings, you can hear Ireland, you can hear Norway, you can hear many of these countries who take the lead. We're not even -- we can't even be a permanent representative in the Security Council so many countries speak on the illegal occupation of the State of Palestine. It's not just our mandate.

Q. I didn't mean to interrupt. I'm so sorry. I think I might have cut you off inadvertently.

A. That's okay.

Q. Your Twitter posts -- not your Twitter posts, the Twitter posts that go on the Observer Mission's Twitter and Facebook feeds, those are the messaging of the Observer Mission and not of the United Nations and not of any other -- any Member State or any other member organization; correct?

A. That is correct.

Q. Okay. When you post to -- well, let me ask this. On and after January 4, 2020, I think we have established that you are the only person who has posted to the Observer Mission's Twitter and Facebook accounts; correct?

A. Correct.

Q. And on and after January 4, 2020, have you made posts to those two social media accounts, that is, the Facebook account and the Twitter account, from the Observer Mission building at [redacted] in Manhattan?

A. Since January 4?
Q. Since January 4 of 2020, that is correct.
A. Yes, I have.
Q. And how many times would you say, just ballpark, on and after January 4, 2020, you have posted to the Twitter account or the Facebook account of the Observer Mission from the Observer Mission building at [redacted] in Manhattan?
A. To take a guess, February, Twitter, maybe 60 times. Facebook, maybe 15 times. Maybe a dozen times.
Q. And the reason that that number is in the range you just mentioned is because of the pandemic; correct?
A. That is correct.
Q. And subsequent to, on or subsequent to January 4, 2020, how many times would you say you have posted or you have made a post to the Observer Mission's Facebook account?
A. After January 4 -- excuse me, 2020?
Q. On and after January 4 of 2020.
A. Facebook? God, I mean, I don't know. I just don't know. That's just a very

specific question. I don't know. Maybe once a week. Do the math. I don't know. Once a week since January 2020, on average.

Q. So you use Facebook -- oh, sorry. Didn't mean to interrupt.

A. It's okay. I can't do the math in my head for you. I don't know.

Q. Would it be fair to say that you post to the Observer Mission's Facebook account less than you post to the Observer Mission's Twitter account?

A. Yes.

Q. Okay. On and after January 4 of 2020, how many times would you say that you have posted to the Observer Mission's Twitter account from the building at [redacted]?

A. From the building, like I said, probably around 60 times. I'm just averaging once a day.

Q. Okay. And putting aside -- you know, putting aside from the building, you know, from the building at [redacted], how many times would you say, in total, you have posted to the Observer Mission's

Twitter account on or after January 4, 2020?
A. I couldn't even count. Wouldn't even be able to give you a ballpark. A lot.
Q. But it's a large number; right?
A. Yes.
Q. And are you aware, I don't know, I'll ask, are you aware of the location of the servers where the Facebook and Twitter accounts maintained by the Observer Mission reside, you know, the Twitter and Facebook --
A. Servers?
Q. Yeah.
A. No.
Q. Okay. Have you ever posted -- well, withdrawn.
On and after January 4, 2020, have you ever posted to the Observer Mission's Facebook account other than from within the territory of the United States?
A. I have only posted in the United States.
Q. Okay. And with respect to the Observer Mission Twitter account, on and after January 4, 2020, have you ever posted to the Twitter account other than from the -- you

know, within the territory of the United States?

A. I have only posted in the United States.

Q. Okay. On and after January 4, 2020, have you left the territory of the United States?

A. No.

Q. Okay. And on and after -- I think I know the answer to this already because we may have covered it, and I apologize if I'm asking again, I'm just trying to keep all the questions together in the transcript. On and after January 4, 2020, has anybody other than you made a post to either the Observer Mission Facebook account or the Observer Mission Twitter account?

A. No.

MR. SINAIKO: Okay. So I would ask Cosette to put up on the screen for our next exhibit, which I think is going to be No. 6, all right, I would ask Cosette to put up Tab 19.

(Deposition Exhibit No. 6 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, do you see the document? We're marking this as Exhibit 6. Is it 6? It is 6. We are marking as Exhibit 6 the document that I just put up on the screen. Can you see it in front of you?

A. Yes.

Q. And do you recognize that to be a tweet that you posted to the Observer Mission's Twitter account?

A. Yes, I would have written it. But I'm just reading it.

Q. Oh, sure. Take your time. If you want to read the -- any document you want to read, feel free, just let us know that you want to read it and we'll turn the pages. You should do whatever you think you need to.

A. It's okay. I just want to read the tweet real quickly. Okay, yes.

Q. And let me ask a question. And again, I apologize if this question betrays a little bit of lack of knowledge on my part.

But was this a retweet of a tweet that had originally been posted by the PLO's Department of Public Diplomacy and Policy?

A. Yes.

MR. SINAIKO: And Cosette, can we just turn the page here?

BY MR. SINAIKO:

Q. This document that is now on the screen in front of you, it's another page of Exhibit 6, is this the tweet that was reposted?

A. No.

Q. Okay. Is this the document that was attached to the tweet that was reposted?

A. Not that I recall.

Q. Okay. Let's back it up here. Just back up one page.

You see what the original -- the original PLO Department of Public Diplomacy and Policy tweet says?

A. Yes.

Q. Okay. Do you see it makes reference to an official position?

A. Yes.

Q. And the document that we -- or the page that we showed you a moment ago, is that a copy of the official position that the PLO Department of Public Diplomacy and Policy released along with this tweet?

A. It looks like it was down to me. There is nothing written in it other than something in Arabic and it was just one word.

Q. Oh. Let's go to the next page. I think there was probably some text at the bottom that you were having difficulty seeing.

A. Oh, I can't -- there's no way I can read that.

Q. Let's zoom in a little bit. There we go. Is that better?

A. Yes, it's better. I mean, I'm not going to read all of it. It's going to waste everyone's time. Okay. What is the question?

Q. So the question is, is that the position statement that was attached to the PLO Department of Public Diplomacy -- I'm sorry, Public Diplomacy and Policy that was attached to the tweet that the Observer Mission retweeted?

A. It appears so, if it is attached to it.

MR. SINAIKO: Let's go to Tab 20, and we will mark that as Exhibit 7.

(Deposition Exhibit No. 7 was marked for identification.)

BY MR. SINAIKO:

Q. And do you recognize this to be another tweet that was posted to the Observer Mission's Twitter feed?

A. I retweeted it, but yes.

Q. Well, I mean, I guess it's a question. Do you recognize this to be a tweet that you posted to the Observer Mission's Twitter account?

A. Yes.

Q. Okay.

A. Yes.

Q. And you see that this document has the hashtag LandsDay?

A. Yes.

Q. Is the hashtag LandsDay one of those hashtags that's designed to maximize the dissemination of the message in the tweet?

A. That particular context, I am not sure if I was trying to maximize it or just commemorate the day.

Q. In general, though -- well, withdrawn.

And in this tweet, you are actually retweeting -- well, withdrawn. Let me try this question one more time.

This is actually a retweet of a tweet that was posted by another organization within the Palestine Liberation Organization; correct?

A. Yes, the Negotiation Affairs Department, yes.

Q. Okay. And the purpose of this tweet was to disseminate publicly the Observer Mission's view and the view of the PLO that Israel was engaged in violations against the land and people of Palestine; is that correct?

MR. BERGER: Object to the form of the question.

BY MR. SINAIKO:

Q. You may answer.

A. The purpose of this tweet is to highlight the violations that the United Nations continuously addresses against the people of Palestine and those that are illegally occupied.

These violations are deemed by -- against many international human rights groups, international human rights law, so these are violations not just by Palestinian Missions to the United Nations, but violations that are also discussed at the United Nations.

Q. Okay. But the purpose of the tweet is, just to cut through it, one of the purposes of the tweet, at least, is to publicize these -- these violations; correct?

MR. BERGER: Object to the form of the question. Asked and answered.

BY MR. SINAIKO:

Q. You may answer. Do you need the question back?

A. No. The purpose of the tweet is to, once again, highlight the illegal violations, as noted in the United Nations, that are conducted against a people that are occupied. This is something that is legally embedded in the charter of the United Nations. Therefore, once again, I am doing my work as the advisor to the Permanent Observer Mission of the State of Palestine to the United Nations to educate people on violations that are deemed illegal by the United Nations.

Q. Understood.

MR. SINAIKO: Okay. Let's go to our next tab. This is going to be Tab 22.

like to go off the record?

MR. SINAIKO: Well, we need to get the audio working. I mean, whatever we have to do. If we have to go off the record to get the audio working, then fine.

THE VIDEOGRAPHER: Okay. We are now off the record. The time is 17:24 UTC time.

(Discussion held off the record.)

THE VIDEOGRAPHER: We are back on the record. The time is 17:26 UTC time.

BY MR. SINAIKO:

Q. Ms. Ghannam, we are back on the record. Can you see that I have put Exhibit 6, Deposition Exhibit 6 back on the screen in front of you?

A. Yes, I can see it.

Q. And this is the retweet that we were talking about a moment ago; correct?

A. Correct.

Q. Okay. And if you look at the bottom of the tweet, you will see that it says, 1:59 p.m., February 4, 2020. Do you see that?

A. Yes.
Q. Would you agree that this was a tweet that was posted at 1:59 p.m. on the 4th of February 2020?
A. Yes.
Q. Okay. And would you agree that this is a tweet that you posted from the UN -- withdrawn.
Would you agree that this is a post that -- to Twitter that you made from the Observer Mission building at 115 East 65th Street in Manhattan at the date and time noted on the tweet?
A. Most likely, yes, unless I wasn't tweeting from my lunch break because it's close to 2:00.
Q. But you would say most likely, just to be clear, you would say most likely --
A. Yes.
Q. -- you tweeted that from inside the Observer Mission building at 115 East 65th Street in Manhattan?
A. Most likely, yes.
Q. Let's go back to tab, I think we said Tab 21, and we're marking that as Exhibit

8.

MR. SINAIKO: Karen, did you get that?

THE COURT REPORTER: Yes. Exhibit 8, yes.

MR. SINAIKO: Yeah. Let's put up Tab 21. That will be Exhibit 8.

BY MR. SINAIKO:

Q. All right. And Ms. Ghannam, do you see Exhibit 8 in front of you?

A. Yes.

Q. Do we agree that this is another tweet that you posted to the Observer Mission's Twitter account?

A. Yes.

Q. Do we agree that this is a tweet that you posted at 9:00 a.m., on April 12, 2020, as stated at the bottom of the tweet?

A. Yes.

Q. And this is actually a retweet; is that right?

A. Yes.

Q. And you were retweeting on behalf of the Observer Mission, to the Observer Mission's Twitter account, a tweet that had originally been posted by the PLO Department of Public Diplomacy and Policy; correct?

A. Correct. Yes.

Q. And this is another communication by the PLO relating to annexation of land in the West Bank; is that correct?

MR. BERGER: Object to the form of the question.

BY MR. SINAIKO:

Q. You may answer.

A. It appears so. I can't read all of it, but I believe it was a statement put out by Dr. Ashrawi regarding annexation.

Q. Okay. And that was something that you felt the Observer Mission should disseminate on Twitter; correct?

A. Absolutely. Annexation is one of the biggest illegal moves that speaks against everything that you can possibly read in the UN charter regarding the illegal occupation of the State of Palestine.

Q. Would it be fair to say that you felt it was important to raise public awareness on this issue by making this Twitter post?

A. Yes.

MR. SINAIKO: Let's go to Tab 22, which we are going to mark as Exhibit 9.

(Deposition Exhibit No. 9 was marked for identification.)

BY MR. SINAIKO:

Q. And Ms. Ghannam, do you have Exhibit 9 in front of you?

A. I do.

Q. And do you recognize this to be a retweet that you made to the Observer Mission's Twitter account on April 28, 2020, at 6:30 p.m.?

A. Yes.

Q. Okay. And do you recognize this also to be a retweet?

A. Yes.

Q. And what is it a retweet of?

A. It was posted by the Institute of Middle East Understanding on, once again, illegal settlements on Palestinian land that the United Nations opposes, and there's several resolutions that oppose it and it is deemed illegal.

Therefore, I felt it was extremely important, on behalf of our Mission to the

United Nations, to continue working under the mandate of the UN by elevating the illegal issue of settlement expansion.

Q. When you say elevating the illegal issue of expansion, you mean raising public awareness on that topic by disseminating --

A. Correct.

Q. To bring attention?

A. Correct.

MR. SINAIKO: Okay. Let's go to Tab 23, and I think we are on Exhibit 10.

(Deposition Exhibit No. 10 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, can you see Deposition Exhibit 10 on the screen in front of you?

A. Not yet.

Q. I think we may be having another technical problem. It looks like the video is frozen. Can you hear me?

A. I can hear you, yes.

Q. Can you see Exhibit 10 on the screen in front of you?

A. No.

MR. SINAIKO: Okay. We

definitely are having a technical problem because I, in my Zoom, I can see Exhibit 10 on the screen in front of me, but I think Ms. Ghannam is unable to see it. And we need to resolve that.

MR. BERGER: Let me see if I can show her on my laptop, if that will solve the problem.

THE WITNESS: Yes, I can see this.

MR. SINAIKO: Great. Actually, mine is working again. Okay.

BY MR. SINAIKO:

Q. Do you recognize this to be a tweet that you posted to the Observer Mission's Twitter account?

A. Yes.

Q. And when did you make this Twitter post?

A. It looks like May 11 at 3:03 p.m.

Q. Do you know where you were -- I mean, do you know where you were physically located at the time you made this Twitter post?

A. May 11th, I was in Washington.

Q. Okay. And the purpose of this

Twitter post was to raise public awareness of Israeli annexation threat; is that correct?

A. Yes.

MR. SINAIKO: Let's go to Tab 40. That will be Exhibit 11.

(Deposition Exhibit No. 11 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, can you see Deposition Exhibit 11 in front of you?

A. Yes.

Q. And can you tell me what you recognize that document to be, if anything?

A. Yes. I believe it speaks to the illegal annexation policy by the occupying Tala (phonetic).

Q. Okay. And, more generally, you recognize this to be a Twitter post on the Observer Mission's Twitter feed; correct?

A. That is correct.

Q. And it's actually another retweet; is that right?

A. That is correct.

Q. And what is it a retweet of?

A. It discusses 18 Senate Democrats, I

tagged them, expressing their concern regarding unilateral annexation of Palestinian territory.

Q. And who made the original post?

A. It looks like -- oh, the original post, excuse me, the PLO Department of Public Diplomacy and Policy.

Q. Right. And that's an entity that is part of one of the Defendants in this case; correct?

A. I -- Public Diplomacy and Policy is an extension of the type of work that the PLO does, I suppose. I don't know whether or not they are Defendants in this case or not, to be quite frank with you. I just know from a media standpoint, without --

Q. Let me put the question again.

Do you understand that the PLO Department of Public Diplomacy and Policy is part of the Palestine Liberation Organization, one of the Defendants in this case?

MR. BERGER: Objection, calls for a legal conclusion, but you can answer again.

THE WITNESS: They are part of the PLO, yes.

BY MR. SINAIKO:
Q. Okay. And you posted this -- well, withdrawn.
Is it correct that you retweeted, on the Observer Mission's Twitter account, the original Twitter posts from the PLO Department of Public Diplomacy and Policy to call attention to the fact that members of the United States Congress had expressed concerns about annexation?
A. Because the United Nations is encompassing, the United States is part of the United Nations. Therefore, it becomes another issue, when we talk about unilateral annexation of Palestinian territory, the United States is a member of the UN. Hence, this falls within the frame of my work.
I am doing work on behalf of the United Nations since the U.S. is a member of the UN.
MR. SINAIKO: All right. Let's go to Tab 41. I think this is going to be 12. So let's mark the next document that pops up as Exhibit 12.
(Deposition Exhibit No. 12 was

marked for identification.)

BY MR. SINAIKO:

Q. And Ms. Ghannam, can you see Exhibit 12 in front of you?

A. Yes.

Q. And what do you recognize that to be?

A. A tweet, it looks -- just a tweet regarding, it's watch now, which looks like it's a video.

Q. Right. So this is a Twitter post that you put on the Observer Mission's Twitter feed on July 29 of 2020; correct?

A. Correct.

Q. And the purpose of this Twitter was to encourage the public to watch the video that was attached to the tweet; is that right?

A. Correct.

Q. And the video was prepared by the PLO Department of Public Diplomacy and Policy; correct?

A. It was prepared by them to highlight the illegal annexation and the illegal occupation of Palestinian territory, which are considered crimes against humanity by the

United Nations, correct.

Q. Right. So the question was, this was -- the question was, this is a video that was prepared by the PLO Department of Public Diplomacy and Policy; correct?

A. Correct.

MR. SINAIKO: Okay. Let's mark -- let's put up Tab 24, which we will mark as Exhibit 13.

(Deposition Exhibit No. 13 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, do you have Exhibit 13 in front of you?

A. I do see it, yes.

Q. And what do you recognize this document to be?

A. It's something written against the illegal use of administrative detention, Palestinian prisoners.

Q. So let me just ask the question in a little bit more focused way. Do you recognize this to be a tweet that you posted to the Observer Mission's Twitter feed?

A. Yes.

Q. And when did you make this post to the Observer Mission's Twitter feed?
A. It looks like October 6, 2020, at 1:00 p.m.
Q. And this was also a retweet; is that right?
A. Yes.
Q. And it was a retweet of a tweet originally posted by the PLO Department of Public Diplomacy and Policy; correct?
A. Yes.
Q. Okay. And the topic of this -- the topic of this tweet was administrative detention; is that right?
A. Yes. Illegal administrative detention, correct.
Q. Understood. And the purpose of this tweet was to elevate public awareness of illegal -- pardon me -- administrative detention; is that correct?
A. Yes.
Q. That was -- right. Okay.
A. Yes. Because many people don't understand what administrative detention is.
Q. Understood.

MR. SINAIKO: So let's go to Tab 25, which we will mark as Exhibit 14.

(Deposition Exhibit No. 14 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, can you see Exhibit 14 in front of you?

A. Most of it. Your face and my face block off the right side of it.

Q. Let's fix it so that you can see -- I want to do whatever -- can you see it better now?

A. That works.

Q. All righty. So can you see the document now?

A. Yes.

Q. And can you tell me whether that's a tweet that you posted to the Observer Mission's Twitter feed?

A. Yes.

Q. And when did you make this posting to the Observer Mission's Twitter feed?

A. November 28, 2020, at 2:27 p.m.

Q. By any chance, do you know where you were located physically when you made that

posting?
A. Thanksgiving, that first year, after COVID -- I believe we were in Washington.
Q. But you weren't in the Observer Mission building?
A. No.
Q. Okay. And the purpose of -- would it be fair to say that the purpose of this tweet was to call public attention to a letter that Dr. Mansour wrote to a UN official?
A. Well, I can't see the original letter, but either Dr. Riyad would have written it or Ambassador Feda would have written it, if Dr. Riyad was out of town.
Q. Let's go to the attachment because that's part of the exhibit.
A. Okay.
Q. Let me just ask the question again. Do you see that the document referenced in the Twitter post is a letter that --
A. A letter by --
Q. I'm sorry?
A. You would have to scroll all the way to the bottom to see who it was written by.
Q. Certainly. Let's do that so you get

to see it.

A. Go up a little more, please. I don't know who drafted it. It was either Ambassador Feda or Dr. Riyad. But most likely --

Q. Let's go down to the bottom of the letter for just a moment. You will see that it appears to be signed by Dr. Khalil El-Halabi. Do you see that?

A. Yes.

Q. Do you understand this to be a letter that Dr. Khalil El-Halabi wrote to a UN official or to -- or perhaps to, you know, Ambassador Mansour?

A. It could be -- it could have been that he was quoted in the letter. I didn't write the letter. I just posted it.

Q. Okay. The purpose of the Twitter post was to disseminate this letter publicly to draw attention to the issue -- raise public attention to the issue raised in the letter; correct?

A. Yes.

MR. SINAIKO: Let's go to Tab 26, which we will mark as Exhibit 15.

(Deposition Exhibit No. 15 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, do you have Exhibit 15 in front of you?

A. I do.

Q. Do you recognize this to be another post that you put on the Observer Mission's Twitter feed?

A. Yes.

Q. And when did you put this post on the Observer Mission's Twitter feed?

A. January 11, 2021 at 9:16 a.m.

Q. And it says, on the top of the first line, statement by PMOFA. Do you see that?

A. Yes.

Q. What is PMOFA?

A. The Palestinian Ministry of Foreign Affairs.

Q. So this was a tweet by which the Observer Mission was disseminating a message created by the Ministry of Foreign Affairs; correct?

A. This is correct.

Q. And the Ministry of Foreign Affairs,

that is -- or the statement by the Ministry of Foreign Affairs, pardon me, is that the document attached at the bottom of the tweet?

A. Yes. I believe -- I believe it's actually a media brief drafted by NAD, the Negotiation Affairs Department.

Q. And it's the PLO -- that's the Palestine Liberation Organization Negotiation Affairs Department; correct?

A. Yes.

Q. And is that part of the Ministry of Foreign Affairs?

A. No.

Q. What is the connection between the Negotiation Affairs Department and the Ministry of Foreign Affairs, if any?

A. I don't know the exact legal connection between the two. My specialty is not in that realm of work.

My work was to just disseminate the information as it pertains to the illegality of the State of Israel's illegal occupation of Palestinians as a violation of Fourth Geneva Convention, as a violation of the UN mandate, as a violation of the UN charter, that they have to take full responsibility of its citizens of the occupying -- the occupying power has to take full responsibility of the citizens it is occupying; hence, the reason for the information regarding the lack of COVID vaccinations to the occupied people.

Q. Okay. So the purpose of this post was to elevate public awareness of the issue that was being raised in this paper prepared by the Palestine Liberation Organization Negotiation Affairs Department; is that correct?

MR. BERGER: Objection, asked and answered. You may answer again. You may answer again.

THE WITNESS: Yes, because, again, if you note, at the end, I write the full statement below at UN, which means I publicly retweet back to the United Nations that what I am stating is a complete violation of the UN mandate, of the UN charter.

And, therefore, it is the occupying power's obligation to administer vaccines, vaccinations to the occupyees, so they are in violation of international law and it is illegal what they are doing to the occupied people of Palestine.

BY MR. SINAIKO:

Q. So would it be fair to say that the purpose of this tweet is to draw to public attention conduct that the Observer Mission regards as a violation of UN requirements?

A. Yes.

MR. SINAIKO: Okay. Let's go to Tab 27. That will be Exhibit 16.

(Deposition Exhibit No. 16 was marked for identification.)

BY MR. SINAIKO:

Q. And Ms. Ghannam, can you see Exhibit 16? I think the video might be frozen again so I'm not sure you can see it.

A. Not yet.

MR. SINAIKO: Let's give it a moment and if it doesn't -- if it doesn't pop up, Mitch, maybe we can show her the document on your laptop.

MR. BERGER: It's popping up.

THE WITNESS: Okay. Yes, I remember this.

BY MR. SINAIKO:

Q. Maybe you can start by telling us, in a high level way, whether this is yet another tweet that you posted to the Observer Mission's Twitter account?
A. Yes, I did.
Q. Okay. And this was done on February 14, 2021; correct?
A. Correct.
Q. Okay. And what exactly was this Twitter, tweet -- let me withdraw that.
What exactly was this tweet disseminating?
A. Why was it disseminated; is that your question?
Q. I was asking what was being disseminated through this tweet.
A. Oh. It was stories of the illegality of the Israeli citizenship law which forces citizens to stay away from each other because of the illegal occupation.
Q. Okay. And the purpose of this tweet was to draw public attention to an Israeli law that the Observer Mission --
A. An illegal Israeli law --
Q. Let me finish the question. Am I

correct that the purpose of this tweet was to draw attention to an Israeli law that the Observer Mission regarded as inconsistent with UN mandates?

A. Yes.

MR. SINAIKO: Okay. Let's go to Tab 28, which we will mark as Exhibit 17.

(Deposition Exhibit No. 17 was marked for identification.)

BY MR. SINAIKO:

Q. All right. Ms. Ghannam, are you able to see Exhibit 17?

A. Not yet.

Q. Okay. Would you let me know when it pops up?

A. Okay.

Q. This is so much easier in person, I have to tell you.

MR. BERGER: I've got it on my laptop, so let me show it to you. Can you see it from here? There you go. It's on the big screen now.

THE WITNESS: Okay.

BY MR. SINAIKO:

Q. Do you recognize this to be another

tweet that you posted to the Observer Mission's Twitter account?
A. Yes.
Q. And it's a tweet that you posted on May 11; correct?
A. Yes.
Q. And this is a tweet -- what was the nature of this tweet? Maybe you can tell us that. I'll try to ask it in a more open-ended way.
A. Sure. So a Mark Ruffalo, which many of you know is a celebrity, used his platform to expose the illegality of the potential expulsion of 1500 Palestinians from occupied Jerusalem.
Q. And in this tweet, the Observer Mission thanked Mr. Ruffalo for making his post; is that correct?
A. Yes, I did.
Q. Okay. Let's go to the next page of this one. Is that Mr. Ruffalo's post that you were forwarding?
A. I believe I was retweeting it, yes.
Q. Okay. And you see that Mr. Ruffalo's post, in turn, attached a

document?

A. Although. Would you mind going back for a second, because I think --

Q. Not at all.

A. -- I might have just retweeted. Okay. I'm sorry, go ahead. Uh-huh.

Q. Do you see that Mr. Ruffalo's tweet that the Observer Mission retweeted to its own Twitter account, in turn, attached the document?

A. I may not have noticed it at the time. I don't recall right now. There was a lot going on during this time period.

Q. Understood. But you see that there is a document attached to Mr. Ruffalo's tweet; correct?

A. I do see that.

Q. And do you understand what that document is?

A. You'd have to open it for me to look at it. I don't recall.

Q. Let's go to the next page.

A. Okay.

Q. Do you understand what that might be?

A. No.
Q. Do you want to -- do you need -- maybe we should show her the rest of the pages of it.
A. Assuming it's some sort of petition.
Q. Okay. Right. So Mr. Ruffalo's tweet -- well, Mr. Ruffalo's tweet attached a petition that members of the public could sign relating to this topic; correct?
A. It appears so.
Q. And the Observer Mission retweeted Mr. Ruffalo's tweet to bring Mr. Ruffalo's tweet to the attention of a broader audience; correct?
A. Yes.
MR. SINAIKO: Okay. Let's go to Tab 29, which will be Exhibit 18.
(Deposition Exhibit No. 18 was marked for identification.)
BY MR. SINAIKO:
Q. Okay. We're going to be on Tab 29. That will be Exhibit 18.
Mr. Ghannam, if you can just let me know when you are able to see that.
MR. BERGER: I'll show it to

her on my laptop.

MR. SINAIKO: I've got to say, I can't wait until we're able to do these things in person again. This is just incredibly painful.

MR. BERGER: She's got it on my laptop for now, until it pops up on the big screen.

BY MR. SINAIKO:

Q. So Ms. Ghannam, can you see Deposition Exhibit 18 now?

A. Yes.

Q. And this is another tweet that you posted to the Observer Mission's Twitter account; is that correct?

A. Yes.

Q. And you made that post on May 15, 2021; is that correct?

A. Yes.

Q. There, now you can see it on the big screen. Once your video pops up, I know you can see it.

So you've got it on the screen in front of you now?

A. Yes.

Q. Was this -- I see that this one, this tweet actually has the SaveSheikhJarrah hashtag; do you see that?

A. Yes.

Q. Would it be fair to say that part of the purpose of that hashtag was to magnify the attention, the public attention that this Twitter posting would receive?

A. Yes.

Q. Okay. And the purpose of this -- well, what was the document? It looks like there's a document attached to this tweet, is that right, or maybe this is retweeting?

A. Retweeting, from what I can recall. I don't know if that's a video or just a picture. If I have to guess, it's just a picture because what happened is that the occupying power indiscriminately and illegally bombed and destroyed the offices of the Associated Press and Al Jazeera Arabic in Gaza and, therefore, the occupied region of Gaza was cut off from the rest of the world, so we had to rely on tweets coming out from the region to show the world what was happening illegally there.

Q. So would it be fair to say that the purpose of this tweet was to call public attention to the Observer Mission's view that Israel had indiscriminately and illegally bombed and destroyed the offices of the Associated Press in Al Jazeera?

A. The purpose of this tweet is to highlight the view of the State of Palestine and the United Nations in terms of the illegality of what Israel was doing in terms of conducting potential war crimes against nearly two million people who are subjected to an illegal blockade of nearly 14 years, which is deemed illegal by the United Nations, yes.

All of this falls within my framework at the UN because all of these issues and everything that you have asked me thus far are things that the UN discusses regularly as illegal and against the UN charter and the UN framework.

Q. I notice -- I notice, Ms. Ghannam, that the first line of this tweet references @POTUS. Do you see that?

A. Yes, the President of the United States.

Q. And why would this tweet make reference to the President of the United States?

A. Because the United States of America is a permanent member of the UN Security Council, and the United States, as a permanent member of the Security Council, regularly votes against any and all resolutions that speak against the illegal occupation of the State of Palestine.

So while the whole world watches this indiscriminate bombing of this illegal occupation, the United States happens to be the only member of the Security Council that cannot publicly make a statement saying that this is wrong.

Q. And you wanted to -- is it true, Ms. Ghannam, would it be fair to say, Ms. Ghannam, that one of the purposes of this tweet was to raise awareness of the positions that the Trump administration was taking within the United States?

A. My purpose was to bring forth the policies that the United Nations as a voting member of the -- excuse me, the United States, as a voting member of the United Nations and as a permanent member of the United Nations Security Council and their extremely important role at the United Nations, and how are they able to sit back and take a side seat to an issue distressing to many people around the world, an issue that's illegal.

Q. Was part of the purpose of this tweet to raise awareness among the American public of the position that its government was taking?

MR. BERGER: Objection, asked and answered. You may answer again.

BY MR. SINAIKO:

Q. You may answer.

A. The objection was to raise awareness that the United States of America, which is a voting member of the Security Council of the United Nations, and a permanent member of the United Nations security member, and the fact that all work conducted in the region, gets the blessing of the United States, through the United Nations, and, therefore, the fact that the United States of America is unable to make a public statement regarding something where the majority of the world was able to demonize in one way or another was perplexing, yes.

Q. Okay. Just going to try one more time. The objective was to raise that awareness among the American public; is that correct?

MR. BERGER: Objection. It's not only asked and answered, but the reason why you keep coming back is that it's argumentative. So I object to the argumentative questioning of this witness.

MR. SINAIKO: She can answer the question.

MR. BERGER: Do you have anything to add to your previous answer?

THE WITNESS: No.

MR. SINAIKO: She can answer the question that I ask, not the questions that you ask, Mr. Berger.

MR. BERGER: You've asked this question three times. It's argumentative, asked and answered. You may answer it again.

MR. SINAIKO: I would like the question read back please, Karen.

(Reporter read back from the

record.)

THE WITNESS: No.

MR. SINAIKO: Let's mark as our next exhibit Tab 30. I think this will be Exhibit 19.

(Deposition Exhibit No. 19 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, can you see Exhibit 19 in front of you?

A. Yes.

Q. Okay. And you recognize -- what do you recognize this to be, if anything?

A. I recognize this very well. It was a mother and a child who were stuck under the rubble of their house after it being illegally shelled and begging for help so that they were not to die.

Q. This was a Twitter post that was put on -- that you put on the Observer Mission's Twitter feed; correct?

A. Absolutely correct.

Q. And the topic was the one that you just mentioned; correct?

A. Yes.

Q. And the purpose of this Twitter feed was to raise public awareness about the conduct that is described in this Twitter post and the Observer Mission's position with respect to that conduct; correct?
A. Yes.
MR. SINAIKO: Okay. Let's go to Tab 31, which we will mark as Exhibit 20.
(Deposition Exhibit No. 20 was marked for identification.)
BY MR. SINAIKO:
Q. Do you see Deposition Exhibit 20 on the screen?
A. No. Yes, now I do.
Q. And do you recognize that to be another tweet that you posted to the Observer Mission's Twitter account on May 17, 2021?
A. Yes.
Q. Okay. And do you see that this Twitter post makes reference to AOC?
A. Yes.
Q. Who is that?
A. Alexandria Ortez -- I always forget her name. The representative from New York.
Q. Right. Alexandria Ocasio-Cortez; is

that right?
A. Yes.
Q. And what about Bush?
A. Yes. Cori Bush.
Q. And what about --
A. John Oliver.
Q. Uh-huh, who else?
A. Ali Velshi, and then Reid, I forget his first name, yes.
Q. And what information was this Twitter post conveying?
A. That the use of the word "apartheid" is not so illegal, it's not deemed as taboo anymore.
Q. Okay. And the purpose of -- the purpose of this, is it correct that the purpose of this tweet was to disseminate publicly the Observer Mission's view that the State of Israel engages in apartheid?
A. The purpose of this tweet is to share information that is left up to the general public to decipher in any way possible that they see fit in terms of the illegalities of what is happening to the people of Palestine that is repeatedly discussed and repeated at

the United Nations.

It is not up to me to decide what people take from what I post.

MR. SINAIKO: Okay. Let's put up Tab 32 and let's mark that as our next exhibit, which will be Exhibit 21.

(Deposition Exhibit No. 21 was marked for identification.)

BY MR. SINAIKO:

Q. Ms. Ghannam, can you see Exhibit 21?

A. Not yet.

MR. BERGER: Every time I show her my laptop, it pops on the video.

MR. SINAIKO: It's like clockwork.

(Off-the-record discussion held.)

BY MR. SINAIKO:

Q. Okay. Can you see the document now, Exhibit 21?

A. Yes.

Q. And that's another posting that you made to the Observer Mission's Twitter account?

A. Yes.

Q. And that was a retweet?

A. Yes.

Q. It was a retweet of a tweet that originally was put up by Senator Warren; correct?

A. Yes.

Q. And do you think you retweeted Senator Warren's tweet the same day that Senator Warren put it up on her own feed?

A. I can't tell you.

Q. In any event, the purpose -- is it correct that the purpose of this tweet was to bring to the attention of the public Senator Warren's view that the Biden administration should press for a just, lasting two-state agreement?

A. The purpose of this tweet is to press on the viewpoint that a lasting two-state agreement is needed to see a just and viable peace in the region, something that the United Nations had been working towards for decades now and is the longest standing occupation and file at the United Nations.

MR. SINAIKO: Okay. Let's go to Tab 33, which we will mark as Exhibit 22.

(Deposition Exhibit No. 22 was

marked for identification.)

MR. SINAIKO: And Mitch, if you could just put the laptop in front of her now so that this works more promptly this time.

MR. BERGER: Yeah. I don't have it yet. See, it worked instantly.

MR. SINAIKO: Like magic.

BY MR. SINAIKO:

Q. Anyway, Ms. Ghannam, do you see Exhibit 22 in front of you?

A. I do.

Q. And do you recognize that to be a tweet that you posted to the Observer Mission's Twitter feed on May 24th of this year?

A. Yes.

Q. And the purpose of this --

A. Yes, I recognize it.

Q. Is it correct that the purpose of this Twitter feed was to bring to public attention criticism of the Biden administration in an article that Newsweek had published?

A. The purpose of this retweet was to bring attention to the fact that the United States, a permanent country of the Security Council who has the right to veto anything they want in the Security Council, and a member of the larger UN General Assembly, has gone ahead and provided the State of Israel with smaller bombs to continue doing the work that they have done illegally.

MR. SINAIKO: Okay. And let's mark, as Exhibit 23, a Twitter post dated July 9 of 2021. That will be Tab 34, Cosette.

(Deposition Exhibit No. 23 was marked for identification.)

BY MR. SINAIKO:

Q. Okay. And Ms. Ghannam, do you recognize -- can you see Deposition Exhibit 23 in front of you now?

A. Yes.

Q. And do you recognize that to be a posting that you made to the Observer Mission's Twitter feed earlier this month?

A. Yes, I retweeted it.

Q. Right. And this is a retweet from the PLO's Negotiation Affairs Division; is that right?

A. Department, yes.

Q. Sorry. I got the title -- I misspoke. It's the Negotiation Affairs

Department?

A. That's okay. Yes.

Q. Okay. And this is another -- another tweet, the purpose of which is to bring to public attention the Observer Mission's views about annexation of territory; is that correct?

A. Particularly the annexation wall, yes.

Q. Okay.

A. And the illegal settlement units that have been established in occupied illegal territories, yes. And the number of civilian deaths as well.

Q. Anything else?

A. No. The tweet is pretty self-explanatory.

MR. SINAIKO: Excellent. We can take that one down. If it's okay -- if it's okay with everybody, I like to just go off the record for five minutes.

MR. BERGER: Yeah.

MR. SINAIKO: Good enough. Thanks.

THE VIDEOGRAPHER: We are now

C E R T I F I C A T E

- - -

I, NADIA GHANNAM, do hereby certify that I have read the foregoing transcript and it is a true and correct copy of my deposition, except for the changes, if any, made by me on the attached Deposition Correction Sheet.

____

____
Date

ERRATA SHEET

PAGE	LINE	REASON FOR CHANGE/CORRECTION
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________
_____	_____	______________________________

COMMONWEALTH OF PENNSYLVANIA)
) SS
COUNTY OF ALLEGHENY)

CERTIFICATE

I, Karen A. Nickel, a notary public in and for the Commonwealth of Pennsylvania, do hereby certify that the witness, NADIA GHANNAM, was by me first duly sworn to testify the truth, the whole truth, and nothing but the truth; that the foregoing deposition was taken at the time and place stated herein; and that the said deposition was recorded stenographically by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witness.

I further certify that I am not a relative, employee or attorney of any of the parties, or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 27th day of July 2021.

Karen A. Nickel, Notary Public
Registered Professional Reporter
Certified Realtime Reporter

Exhibit 3

UNITED STATES DISTRICT
SOUTHERN DISTRICT OF NEW YORK
Case No. 18-Civ. 12355

---------------------------------------x

SHABTAI SCOTT SHATSKY, individually and as personal representative of the Estate of Keren Shatsky, J ANNE SHATSKY, individually and as personal representative of the Estate of Keren Shatsky, TZIPPORA SHATSKY SCHWARZ, YOSEPH SHATSKY, SARA SHATSKY TZIMMERMAN, MIRIAM SHATSKY, DAVID RAPHAEL SHATSKY, GINETTE LANDO THALER, individually and as personal representative of the Estate of Rachel Thaler, LEOR THALER, ZVI THALER, ISAAC THALER, HILLEL TRATTNER, RONIT TRATTNER, ARON S. TRATTNER, SHELLEY TRATTNER, EFRAT TRATTNER, HADASSA DINER, YAEL HILLMAN, STEVEN BRAUN, CHANA FRIEDMAN, ILAN FRIEDMAN, MIRIAM FRIEDMAN, YEHIEL FRIEDMAN, ZVI FRIEDMAN, and BELLA FRIEDMAN,

Plaintiffs,

- against -

THE PALESTINE LIBERATION ORGANIZATION and THE PALESTINE AUTHORITY(a/k/a "The Palestinian Interim Self-Government Authority" and/or "The Palestinian National Authority"),

Defendants.

---------------------------------------x

Videotaped Deposition of 30(b)(6) Witness, FARID GHANNAM, (with all parties participating remotely), on Thursday, July 29, 2021, commencing at 7:33 a.m., before Roberta Caiola, a Professional Court Reporter and a Notary Public.

A P P E A R A N C E S:

For the Plaintiffs:
ESZTER VINCZE, ESQ.
MELISSA MAXMAN, ESQ.
RONALD F. WICK, ESQ.
(Admitted Pro Hac Vice)
COHEN & GRESSER, LLP
2001 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20006
mmaxman@cohengresser.com
evincze@cohengresser.com

STEPHEN M. SINAIKO, ESQ.
COHEN & GRESSER, LLP
800 Third Avenue
New York, NY 10022

For the Defendants:
MITCHELL R. BERGER, ESQ.
GASSAN A. BALOUL, ESQ.
JOSEPH ALONZO, ESQ.
SALIM KADDOURA, ESQ.
SQUIRE PATTON BOGGS
2550 M Street NW
Washington, DC 20037
gassan.baloul@squirepb.com
mitchell.berger@squirepb.com
joseph.alonzo@squirepb.com

Also Present:
Mordechai Haller
Simek Shropshire, Paralegal
Cohen & Gresser
Arabic-Hadeer Al Amiri, The Interpreter
Corey Wainaina, The Videographer

INDEX

EXAMINATION OF FARID GHANNAM		PAGE
FARID GHANNAM	BY MS. VINCZE	7

E X H I B I T S

EXHIBITS	DESCRIPTION	PAGE
Exhibit 1	30(b)(6) Notice dated June 16, 2021	24
Exhibit 2	Document Bates stamped Shatsky-JD00012 through Shatsky-JD00249	45
Exhibit 3	Document Bates stamped Shatsky-JD00113 through Shatsky-JD00117	61
Exhibit 4	Document Bates stamped Shatsky-JD00977 through Shatsky-JD00990	74

Farid Ghannam

THE VIDEOGRAPHER: Good morning, everyone. We are now on the record. Participants should be aware that this proceeding is being recorded and, as such, all conversations held will be recorded, unless there is a request and agreement to go off the record.

This is the remote video recorded deposition of Farid Ghannam. Today is Thursday, July 29, 2021. The time is now 11:32 UTC time. We are here in the matter of Shatsky versus PLO.

My name is Corey Wainaina, remote video technician on behalf of U.S. Legal Support, located at 90 Broad Street, New York, New York. I am not related to any party in this action, nor am I financially interested in the outcome. At this time, will the reporter, Roberta Caiola, on behalf of U.S. Legal Support, please enter the statement

Farid Ghannam
for remote proceedings into the record.

THE COURT REPORTER: The attorneys participating in this deposition acknowledge that I am not physically present in the deposition room and that I will be reporting this deposition remotely.

They further acknowledge that, in lieu of an oath administered in person, I will administer the oath remotely, pursuant to executive order number 202.7 issued by Governor Cuomo on March 19, 2020.

The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting. Please indicate your agreement by stating your name and your agreement on the record.

MS. VINCZE: Eszter Vincze for Cohen & Gresser. We represent plaintiffs. We agree.

MR. BERGER: This is Mitchell

Farid Ghannam

Berger, Squire Patton Boggs on behalf of defendants, and we agree.

ARABIC-HADEER AL AMIRI, called as the official interpreter, having been duly sworn (by Roberta Caiola) to translate questions from English to Arabic and answers from Arabic to English, translated as follows:

FARID GHANNAM, called as a witness, having been duly sworn (through the interpreter) by a Notary Public of the State of New York, testified as follows:

MS. VINCZE: Before we begin with Mr. Ghannam, just one housekeeping measure. Since we are here remotely during the COVID-19 pandemic, we would ask that defendants confirm that, pursuant to Rule 30(b)(4) of the Federal Rules of Civil Procedure, that today's deposition may be taken by video conference as we're proceeding.

Pursuant to Rule 29, the parties also stipulate that

Farid Ghannam

Ms. Caiola is an appropriate officer before whom this deposition may be taken, even though the witness is in Jordan and Ms. Caiola is located in New York. Do we agree?

MR. BERGER: This is Mitchell Berger on behalf of defendants. We agree.

MS. VINCZE: Thank you.

EXAMINATION

BY MS. VINCZE:

Q. Good morning, Mr. Ghannam. Thank you for coming here today. My name is Eszter Vincze. I'm here representing plaintiffs in this case and I will be asking you some questions today and tomorrow. Before I do so -- pardon?

(Pause in proceedings.)

-- I just want to go through some ground rules so that you know what to expect today.

Please state your name and address for the record.

A. My name is Farid Ahmed Abed

Farid Ghannam

Hafez Ghannam. I live in Palestine, Ramallah.

Q. What is your occupation and title?

A. My occupation is the Deputy of the Minister of Finance, and my title is A1.

Q. Have you ever had your deposition taken before?

A. No.

Q. So I'm going to go over the process with you, so that we're all on the same page. Is that all right?

A. Yes.

Q. Do you understand that you are testifying under oath?

A. Yes.

Q. The court reporter will be transcribing everything we say today. To make sure that the record is accurate, and especially since this deposition is taking place via remotely, in light of the COVID-19 pandemic, it is important that we do not speak over each other, so that only

Farid Ghannam

I will be using shorthand for some terms. For example, when I refer at times to "defendants," I mean both the Palestinian Authority and the Palestine Liberation Organization. Do you understand?

A. Yes.

Q. And I will be referring to the Palestinian Authority as the PA sometimes. Do you understand that?

A. Yes.

Q. And I will be referring to the Palestinian Liberation Organization as the PLO sometimes. Do you understand that?

A. Yes.

Q. Thank you. Let's briefly review your educational background. What is your highest level of education?

A. The highest level of education that I obtained is a master's degree in financial science and banking, and now I'm studying the Ph.D.

Q. And where did you receive that master's degree?

A. In the Islamic University in

Farid Ghannam

Gaza.

Q. Where are you studying for your Ph.D.?

A. Can you repeat the question?

THE INTERPRETER: This is the interpreter. I will repeat the question.

Q. Where are you studying for your Ph.D.?

A. I registered in Morocco, in Mohamed Al Khamis Universiti.

Q. Do you have any licenses, any professional licenses?

A. Yes.

Q. What are those licenses?

A. A license in the financial sciences and banking. Also, a license to teach in the science, financial science in the university.

Q. And do you teach at the financial -- at the university?

A. I taught in Birzeit University for four years, the financial science and banking.

Farid Ghannam

MR. BALOUL: This is an objection to the translation. It's not banking. It's accounting.

THE INTERPRETER: Accounting.

Q. What courses did you teach?

A. It's general financing.

Q. Do you have a bachelor's degree?

A. Yes.

Q. Where is your bachelor's degree from?

A. From Alexandria University from Egypt.

Q. And when did you obtain that bachelor's degree?

A. 1983.

Q. And when did you begin your master's program?

A. I started studying for the master's degree in 2002.

Q. And when did you obtain your master's degree?

A. In 2006.

Q. Do you have any professional

Farid Ghannam

certifications?

A. Other than the certificate concerning the financial sciences and accounting, I don't have any other certificates.

Q. You have been designated to testify on behalf of both the PA and the PLO, correct?

A. Yes.

Q. Do you have a formal position within the PA?

A. Deputy of the Finance, Minister of Finance.

Q. Do you hold any other titles within the PA?

A. I'm a member in multiple organizations in the Palestinian Authority.

Q. What are those organizations?

THE INTERPRETER: This is the interpreter. I'm going to ask the respondent to say them one by one.

A. The Alliance for Industrial Cities.

(Court reporter clarification.)

Farid Ghannam

THE INTERPRETER: The Affairs of Industrial Cities.

A. The Affairs of the Water Authority. The Employment Palestinian Authority.

Q. Is that -- are there any other organizations of which you are a member within the PA?

THE INTERPRETER: So this is interpreter.

(Clarifying.)

A. The Finance Palestinian Authority.

Q. Are there any other organizations, besides the ones that you have listed within the PA, of which you are a member?

A. No.

Q. What do you do for the Alliance for the Affairs of Industrial Cities?

A. I work as a member of the regulatory committee in this institute.

Q. And what do you do for the Affairs of the Water Authority?

Farid Ghannam

A. The same function. A member in the...

Q. A member in the what?

A. The same function. A member in the organization's affair.

MS. VINCZE: This is a question for the interpreter. Did he -- did he say -- can you repeat what he said to me again, please?

THE INTERPRETER: Yes, ma'am. It's the same function. It's a member in the organization affairs.

Q. What do you do in the employment PA?

A. I work as a member in the organization's committee.

Q. And what do you do for the finance PA?

A. I'm a member in the organization's committee.

Q. What is the Alliance of the Affairs of Industrial Cities?

A. I work in the industrial cities as a member.

Farid Ghannam

Q. Yes, but what is the organization?

A. This is a committee to encourage the industrial sector and put it in a position to have privilege, financial privileges.

Q. And what is the Water Authority?

A. It organizes the function of water in Palestine.

Q. And what is the Employment Authority?

A. It regulates the Palestine employment, whether inside or outside.

Q. And what is the Finance Authority?

A. It's a substitute for the Satal (phonetic) Palestinian Bank.

Q. And how does that organization relate to the Ministry of Finance?

A. It has a strong relationship to the Ministry of Finance.

Q. Is it separate from the Ministry of Finance?

Farid Ghannam

A. The Finance Authority is the one that is separate from the Ministry of Finance. The other organizations are within the other ministries, and it has a separate budget.

Q. As Deputy Minister of Finance who do you report to?

A. The Minister of Finance.

Q. Who is that?

A. Shukri Bishara.

Q. Do you report to anybody else?

A. For me, it's only the Minister of Finance.

Q. What responsibilities come with your current position?

A. To have the Minister of Finance regulating the financial affairs.

Q. For how long have you held this position?

A. Approximately four years.

Q. And what did you do before you began working in this position?

A. The general director of the Palestinian budget.

Farid Ghannam

Q. Was that also within the Ministry of Finance?

A. Yes.

Q. And what did you do before you were general director of the Palestinian budget?

A. The deputy of the general director of the budget, financial budget.

Q. And what did you do before you began working in that position?

A. Main accountant in the -- main accountant in the general directorate.

Q. The general directorate is within the PA?

A. Yes.

Q. And what did you do before that?

A. I worked as a sub-accountant in the general directorate and the budget, financial budget.

Q. And what did you do before that?

A. I was working as an accountant in the U.S.A.

Farid Ghannam

Q. How long have you been working for the PA?

A. 25 years.

Q. For those 25 years did you hold any title, other than the ones that you just listed for me as we were going through your past employment?

A. I didn't work in any positions, other than the ones that I have mentioned to you.

Q. In your current position, are there any particular aspects of the work of the Ministry of Finance that are directly within your purview?

A. Within my purview what?

Q. Are there any particular subdivisions of the Ministry of Finance that report to you, for example?

A. As a deputy in the Ministry of Finance, I follow up with all the subdivisions of the Ministry of Finance.

Q. As a deputy of the Ministry of Finance, are you engaged in any particular work that the Ministry of Finance does

Mr. Ghannam?

A. Yes, I do.

MS. VINCZE: This is Exhibit Number 1. For the record, this is the 30(b)(6) Notice dated June 16, 2021.

MR. BERGER: Do you have an Arabic translation?

MS. VINCZE: No.

Q. Do you recognize this document, Mr. Ghannam?

A. Yes.

Q. What is it?

A. This document was presented to me, translated into Arabic by the attorneys, concerning some synonyms, and I read it.

Q. When did you first see it?

A. I saw this document about a month ago.

Q. And do I understand it correctly that you were shown this document by your attorneys?

A. Yes.

Farid Ghannam

Q. Are you appearing today pursuant to this notice?

A. Yes.

Q. Are you aware that you are here to testify on behalf of the PA?

A. Yes.

Q. Who designated you to testify on behalf of the PA?

A. The Minister of Finance.

Q. Are you aware that you are also here to testify on behalf of the PLO?

A. Yes.

Q. Who designated you to testify on behalf of the PLO?

A. The Minister of Finance.

Q. Have you read the deposition topics on pages 2 through 3?

A. Yes.

Q. Topic 1 asks for testimony regarding any payments made by defendants, directly or indirectly, after April 18, 2020 to any individual -- pardon me -- payments made by defendants directly -- withdraw the question.

Farid Ghannam

Topic 1 asks for testimony regarding "any payments made by defendants, directly or indirectly, after April 18, 2020 to any family member of any individual following such individual's death while committing any of the specified attacks, including the reason for such payments."

Correct?

A. Yes.

Q. Are you the person most knowledgeable about this topic with respect to the PA?

A. Yes.

Q. Are you the person the most knowledgeable about this topic with respect to the PLO?

A. Yes.

Q. Do you have direct knowledge of this topic?

A. Yes.

Q. How do you have direct knowledge of this topic?

A. All the payments that are made to the families of the detainees and

Farid Ghannam

martyrs, whether it's inside or outside, goes through the Minister of Finance.

MR. BALOUL: Objection to -- this is Gassan Baloul. Objection to the translation. He did not say detainees. He said all payments, period. No detainees.

THE INTERPRETER: This is the interpreter. He said both.

(Cross-talk in Arabic.)

MR. BERGER: Why don't we have him repeat the answer, and maybe this time he'll give us a little bit more.

MS. VINCZE: Mr. Berger, I'm going to repeat the question, and then we will have the answer. All right?

Q. Now, how do you have direct knowledge of this topic?

A. All the payments that is made to the families of the wounded and martyrs, whether inside or outside, goes through the Ministry of Finance.

MS. VINCZE: A quick question

Farid Ghannam

for the interpreter. All the payments made to the families of the wounded and the what?

THE INTERPRETER: The martyrs.

MS. VINCZE: Martyrs?

THE INTERPRETER: Yes.

MS. VINCZE: Thank you.

(Court reporter clarification.)

Q. Mr. Ghannam, how did you prepare for today's deposition regarding this topic?

A. After being designated to testify in this matter, I formed a group of employees to try, within my accumulative experience for a long time in the Ministry of Finance, to gain and to let them obtain the much possible detailed information about this matter, as you requested.

Q. Who was in that group of em --

A. Can I continue?

MS. VINCZE: I withdraw the question. Please continue, Mr. Interpreter.

A. I did call the deputy of the

Farid Ghannam

And, Counsel, when you get to a convenient stopping point, we've been going about an hour and a half, we will appreciate a short break.

MS. VINCZE: I've got a couple of more questions, and then we can take our break.

MR. BERGER: Sounds good.

Q. Mr. Ghannam, it was with this group that you discussed the laws that govern the mechanisms regarding these topics and the Martyrs and Wounded Affairs?

A. The affairs to govern the matters of families of wounded and martyrs, yes.

Q. What laws?

A. There is a law that was produced and modified the previous law. It was produced in 2016, governing the taking care of the families of the wounded and martyrs.

Q. Do you know the title of that law?

THE INTERPRETER: This is the

Farid Ghannam

interpreter. I will repeat the question.

(Question repeated.)

THE INTERPRETER: This is the interpreter. The respondent didn't hear me clearly, so I will repeat the question.

(Question repeated.)

A. It's the law taking care of the families of wounded and martyrs.

MS. VINCZE: All right. Let's go off the record, please, and take a five-minute break.

THE VIDEOGRAPHER: We are now off the record. The time is 13:02 UTC time.

(A recess was taken.)

THE VIDEOGRAPHER: We are back on the record. The time is 13:18 UTC time.

MS. VINCZE: Thank you.

Q. Mr. Ghannam, earlier we were speaking about how you're preparing to speak on topic 3, is that right?

Farid Ghannam

A. Yes.

Q. And you mentioned that you met with certain employees of the Ministry of Finance?

A. Yes.

Q. Who did you meet with from the Ministry of Finance?

A. I met with Mohammad Hamasha, the IT for the salaries in the Ministry of Finance. Ms. Fidak Abu Hmaid, the legal consultant for the Ministry of Finance. And Ms. Deltalik Omal, (phonetic), an accountant in the Ministry of Finance.

Q. Did you meet with anybody else from the Ministry of Finance in preparation for this deposition?

A. No.

Q. Subsequent to the date we issued this notice, defendants produced other documents reflecting payments made by defendants directly or indirectly after April 18, 2020 to family members of individuals who died while committing certain of the specified attacks. I

Farid Ghannam

believe those documents have production numbers JD559 through JD1101.

Are you similarly prepared to answer questions about those later-produced documents?

A. Yes.

MS. VINCZE: Simek, can you please pull up tab 7 onto the screen. We are marking this as our next deposition exhibit. I believe that makes it Exhibit Number 2. It's a document we received from -- well, hold on, here we go. It's a document we received from defendants with production numbers JD12 through JD249.

(Exhibit 2, Document Bates stamped Shatsky-JD00012 through Shatsky-JD00249, marked for identification.)

Q. Mr. Ghannam, can you see the document?

A. I'm waiting.

MS. VINCZE: Simek, can you

Farid Ghannam

please scroll down to the original, that is JD12, not the translation.

MR. BERGER: We don't have any document up on the screen.

MS. VINCZE: Do you have paper copies available?

MR. BERGER: We're trying to get them.

MS. VINCZE: Okay.

MR. BERGER: 12 through 249. I don't think we have them organized by that way, but you'll tell us.

MS. VINCZE: Well, these are the documents you produced to us, production numbers JD12 through JD249.

MR. BERGER: Yeah, I heard you the first time. I'm telling you we don't have our paper copies organized that way.

MS. VINCZE: Can you put these documents in front of him?

MR. BERGER: Okay, now it's up on the screen.

Farid Ghannam

Q. Mr. Ghannam, can you see the document?

I can repeat the question. Mr. Ghannam, can you see the document?

A. Yes.

Q. Do you recognize it?

A. Yes.

Q. What is it?

A. This is a document prepared by the affair -- by the Martyrs and Wounded family affairs to represent the financial component regarding Muslim -- regarding the Bay Sala Hadine (phonetic) --

(Interpreter speaking in Arabic.)

THE COURT REPORTER: I'm sorry, I didn't understand that last part.

THE INTERPRETER: Regarding -- this is the interpreter. This is a name. It is Sala Hadine Jadalahasan. (Phonetic).

Q. Mr. Ghannam, I'm going to represent to you that this exhibit contains the originals with production numbers JD12

Farid Ghannam

through JD -- I believe it is 249.

MS. VINCZE: Mr. Berger, would you stipulate that these are business records admissible under Rule 8036 of Federal Rules of Evidence?

MR. BERGER: Yeah, I think we sent you a written stipulation to that effect about two weeks ago, and never heard back from you. But, yes.

MS. VINCZE: But, yes? Thank you.

MR. BERGER: Yes.

MS. VINCZE: Okay.

Q. Looking at this page, Mr. Ghannam, this refers to the Martyrs and Wounded Affairs Establishment, is that right?

A. Correct.

Q. Is that the same Martyrs and Wounded Affairs that you were working with to prepare for this deposition?

A. Yes.

Q. What is the Martyrs and Wounded Affairs Establishment?

Farid Ghannam

A. It's an estab -- one of the establishments of the Palestinian Authorities that present support for the families of wounded and martyrs. They present financial support for these families, and rehabilitation, to enable them to live a decent living and to prevent financial needs and to have a good living condition in the community.

Q. Who is the head of the martyrs, families and injured -- pardon -- the Martyrs and Wounded Affairs Establishment?

A. The Minister Intissar al-Wazir.

Q. Does she have any other titles within the PA?

A. No.

Q. Does she have any other -- any titles within the PLO?

A. She was the head of the PLO when it was outside. And when the PLO came inside, when the PA has been established in 1994, and she continued to be the head of the PLO.

Q. Does she still have that

Farid Ghannam

position?

MR. BALOUL: Sorry, Counsel, this is another objection to the translation. Not the head of the PLO. The head of the ministry of --

(Court reporter clarification.)

MR. BALOUL: The head of the ministry of the families of martyrs and those injured.

MS. VINCZE: The head of the? I can't hear you.

MR. BALOUL: The institute of the -- for the families of the martyrs and those injured.

MS. VINCZE: Mr. Interpreter, is that what Mr. Ghannam said?

THE INTERPRETER: I thought -- this is interpreter speaking now. Not on the other part. The question was does she hold any positions in the PLO. This was the question pending.

MS. VINCZE: That is correct. And what was the answer that Mr.

Farid Ghannam

Ghannam provided?

THE INTERPRETER: My understanding was he was referring to the PLO. I'm more than happy to clarify that, if you want me.

(Indiscernible male voice.)

MS. VINCZE: I will repeat the question. No, no, Mr. -- first of all, I can't hear who's speaking right now, but I will re-ask the question and then we will get the answer that we get and take it from there.

Q. Mr. Ghannam, what -- withdrawn.

Mr. Ghannam, does Ms. Al-Wazir hold any titles within the PLO?

A. For the time being, she doesn't hold any position in the PLO.

Q. Did she hold a title in the PLO previously?

A. Yes.

Q. What was that title?

A. She was the head of the establishment of the martyrs and wounded

Farid Ghannam

that belongs to the PLO.

Q. And when did the establishment of the martyrs and wounded belong to the PLO?

A. It joined it in 1968.

Q. And until when was it part of the PLO?

A. Until 1999.

Q. What happened in 1999?

MR. BERGER: Go ahead, please. I'll note my objection after you translate.

(Interpreter translates.)

MR. BERGER: Objection. Outside the time frame for jurisdictional discovery, but you may answer.

A. In 1999, the followers of the martyrs and wounded were transferred from outside the country to inside -- to become inside the country, and it became part of the social ministry, social affairs ministry, and so it was headed by Minister Intissar al-Wazir.

Farid Ghannam

Q. Is the social affairs ministry part of the PA?

A. It's part of the PA.

Q. And, if I understand correctly, it was part of the PA in 1999?

MR. BERGER: Objection. Outside the scope of the notice and outside the scope of jurisdictional discovery, but you may answer if you know.

A. Yes, up until 1999, it was part of the PLO. From 1999, it became under the PA, up until 2006, where it became separated from the Ministry of Social Affairs, to become a separate establishment that has its own budget and affairs.

Q. To clarify. When you say it became a separate establishment, does that mean it's an establishment within the PA?

MR. BERGER: Same objection. You may answer if you know.

A. It became an establishment within the PA, but it's independent, and it's independent within its financial

Farid Ghannam

A. It's an establishment like any other establishment, it would be within the general budget. The budget is discussed depending on the financial needs of this establishment and the document presented.

Q. Now, Mr. Ghannam, do I understand correctly that among the things the martyrs and -- martyrs' families and wounded care establishment does, is that it provides support to the families of the wounded and martyrs?

A. Yes.

Q. What kinds of support?

A. The kind of support that it provides for the martyrs' families and wounded, it's the financial support based on the needs of the family that is determined by the --

(Cross-talk in Arabic.)

A. Also, it provides rehabilitation and health programs for the martyrs' families and wounded.

Q. What is the basis for the establishment's authority to provide those

Farid Ghannam

kinds of support?

MR. BERGER: Objection, ambiguous. You may answer if you understand the question.

A. This establishment works according to the law that governs the health -- taking care of the family -- martyrs' families and wounded, and whatever the laws say, the establishment works according to that law.

Q. Does that include the 2016 law that you mentioned previously?

A. Yes.

Q. How is the work of the Martyrs' Family and Injured Care Establishment funded?

A. From the general budget.

Q. And what is the source of the funds allocated to it from the general budget?

A. The general income that comes from the taxes collected, directly and indirectly, from the Palestinian population.

Farid Ghannam

MS. VINCZE: Can I ask you to please pull up tab 8. We can mark this as our next deposition exhibit. It's a document -- let's page down to the original. Thank you.

(Exhibit 3, Document Bates stamped Shatsky-JD00113 through Shatsky-JD00117, marked for identification.)

MS. VINCZE: This is a document we received from defendants with production numbers JD113 through JD117. This is Exhibit 3, I believe.

Mr. -- go ahead.

(Interpreter interpreting.)

Q. Mr. Ghannam, can you see this document?

A. Yes.

Q. What is it?

A. This is a document generated from the martyrs and wounded family affairs regarding the financial division that belongs to the financial support for the family of the martyr.

Farid Ghannam

Q. And who determines how that law will be implemented?

A. Division 5 and Division 10 of that law determines in details who's the beneficiaries and the amount of allocation and it's the division also that determines whether that person is married or single and the allocations paid for the children. This is in Division 5 and Division 10.

Q. Of which law?

A. It's the law that governs taking care of the families of martyrs and wounded, law number -- for the year 2016.

(Court reporter clarification.)

MS. VINCZE: This is for the interpreter. But he provided a number before the year of the law, didn't he?

THE INTERPRETER: No, ma'am. It's for year 2016.

MS. VINCZE: For year 2016.

Q. On this document it says "case type, martyr." Right?

A. Yes.

Farid Ghannam

Q. Does that mean that Mr. Al-Hafez has been determined to be a martyr?

A. Yes.

Q. And under that there is a section called "Beneficiaries' Data." Correct?

A. Yes. Yes.

Q. And there is a name provided in that section, correct?

A. Yes.

Q. That name is Ahed Mahmoud Abd Al-Hafez, correct?

A. Yes.

Q. What does it mean that his name is there?

A. This means this person is the beneficiary person who's going to receive the payment that is determined by the law for the martyr's family.

MS. VINCZE: Simek, can we page down to 114.

Q. There's a section at the top of this page called "Discontinuation Data."

Farid Ghannam

A. Yes.

MS. VINCZE: Simek, can you please page down to JD117.

Q. A lot of the information in this table has been blacked out, correct?

A. Yes.

Q. What is the information that has been blacked out?

A. It's the information before April 18, 2020, which is the cause for the witnessing of the appearance today.

Q. Is this banking information?

A. This is information that does not consent with the duration that is in question. That's it.

Q. Looking at the rows that have not been blacked out, I see there are columns titled Month, ID No., Name, Stipend. What is the information in these rows?

A. It's -- we have four columns on this document. The first column is the month, it's April of 2020, and then the ID number, and then the name of the

Farid Ghannam

beneficiary, and then the amount of the salary received by the beneficiary that is determined according to the law, and this is on a monthly basis and the currency is in Shekel.

Q. What does it mean that it's Mr. Al-Hafez's name in the name column?

A. It means that he is the beneficiary of this allocation.

Q. And in the month column, we have April 1, 2020 through April 1, 2021, right?

A. Yes, ma'am.

Q. Is it fair to say this shows that Mr. Al-Hafez has been receiving monthly payments from April 2020 through April 2021?

A. Yes.

Q. And to clarify. This is Mr. Ahed Mahmoud Abdallah Abd Al-Hafez and not Mr. Sadeq Ahed Mahmoud Abd Al-Hafez, who is dead?

A. Yes.

Q. And Mr. Ahed Mahmoud Abdallah

correct?

A. He received it according to the law that governs the work of the establishment for martyrs and wounded to support the family, because the family is in need, and it's not because their son is a martyr. This -- these amounts are for economical support for the families of the martyred person.

Q. Mr. Sadeq Ahed Mahmoud Abd Al-Hafez was determined to be a martyr by the Martyrs' Families and Injured Care Establishment, correct?

A. Yes.

Q. And he was determined to be a martyr because the Martyrs' Families and Injured Care Establishment reviewed the applicable regulations and laws and decided that he qualified, correct?

A. Yes.

Q. That is why on JD113 it says "Case Type Martyr," correct?

A. Yes.

Q. And if Mr. Sadeq Ahed Mahmoud

Farid Ghannam

Abd Al-Hafez had not been determined to be a martyr, then his -- then Ahed Mahmoud Abdallah Abd Al-Hafez would not be receiving these payments, correct?

A. According to the law of the establishment of the martyrs and wounded affairs, he has to be considered as a martyr, and then, according to the law, it has to be a financial need for the family, and it's determined by the establishment for martyrs and family and the wounded family affairs that the family is in need, and that, therefore, this allocation was dispensed to the family to cover the economic needs.

Q. But, if Mr. Ahed Mahmoud Abdallah Abd Al-Hafez was simply in need, and his son had not been determined to be a martyr, then he would not be receiving these payments, correct?

A. According to the law, yes.

MS. VINCZE: Okay. I would like to take a quick break, so let's go off the record and take our little five-minute break.

(Recess taken.)

THE VIDEOGRAPHER: We are off the record. The time is 14:34 UTC time.

(A recess was taken.)

THE VIDEOGRAPHER: We are on the record. The time is 14:47 UTC time.

MS. VINCZE: We would like to designate this as Exhibit Number 4, I believe.

(Exhibit 4, Document Bates stamped Shatsky-JD00977 through Shatsky-JD00990, marked for identification.)

Q. This is a document we have received from defendants, production numbers JD977 through JD9900 -- I'm sorry, JD990.

Mr. Ghannam, do you recognize this document?

A. Yes.

Q. And you can see it?

Farid Ghannam

A. Yes.

Q. What is it?

A. This is a document produced from the establishment for the wounded and martyrs family affairs, and this document is called social search.

Q. Social search.

MR. BALOUL: No, it's social investigation.

MR. BERGER: I think that's -- the translation is -- we think is investigation, not search.

MS. VINCZE: I see.

Q. Mr. Ghannam, when you spoke about preparing for the deposition today, you mentioned looking at social investigative reports, I believe. Is that right?

A. Yes.

Q. Is this the kind of document you were referring to?

A. Yes.

Q. What is a social investigative report?

Farid Ghannam

A. This report is -- I will call that is done by an investigator from the establishment of the martyrs and wounded affairs that investigates when a family submits a request. The investigation is done to make sure that the family is in need, and this is as a result of the loss of one of their children.

Q. When you say "when a family submits a request," is that a written request?

A. The family goes to the establishment for the wounded and martyrs affairs and they meet with the social worker.

Q. Is the social worker the same person who prepares the report?

A. Yes.

Q. How does the family know to go to the social worker?

A. When a martyr death happens in a Palestinian family, the family goes to the establishment of the martyrs and wounded family affairs, and they are met by

Farid Ghannam

a social worker or social investigator to make sure that the family is in need for this allocation.

Q. Let's turn to -- back to the document. It says "Case: Martyr of Al-Aqsa Intifada." Correct?

A. This is what is written in the social investigation report. It's written as martyr of Al-Aqsa Intifada.

(Court reporter clarification.)

Q. And that information was provided by the employee of the Martyrs' Families and Injured Care Establishment that wrote this report, correct?

A. Yes.

Q. What does Al-Aqsa Intifada mean?

A. Al-Aqsa Intifada, it's a population movement against the occupation.

Q. And there is a date on this document, correct?

A. Yes.

Q. March 3, 2002?

A. Yes.

Farid Ghannam

Q. What is the significance of that date?

A. This date indicates the date that the family visited or came to the establishment of martyrs and wounded.

Q. And it says "Governorate: Qalqilya." Correct?

A. Yes.

Q. What is the significance of that?

A. The importance of this is to indicate whom did the investigation as the division of the office and the government of Qalqilya.

Q. Looking at the upper left corner of the document -- upper right corner, pardon me. It says -- it has the Palestinian Authority's emblem on it, correct?

A. Yes.

Q. So this report was issued when the Martyrs' Families and Injured Care Establishment was still part of the PA, correct?

Farid Ghannam

A. Yes, within the Palestinian Authority and the ministry of the social affairs.

Q. Let's turn to the next page, 978. The top of the page says "Part 1: Personal Information." Correct?

A. Yes.

Q. And it says the case's name Sadeq Ahed Mahmoud Abd Al-Hafez, correct?

A. Yes.

Q. Is that the same Sadeq Ahed Mahmoud Abd Al-Hafez that we were discussing before?

A. Yes.

Q. So that is the person who is designated as a martyr in Exhibit 3?

A. Yes.

Q. And it says "Beneficiary's full name, Ahed Mahmoud Abdallah Abd Al-Hafez." Correct?

A. Yes.

Q. And beneath that name, in parentheses, it says "wife, father, mother, brother, sister." Correct?

Farid Ghannam

A. Yes.

Q. And father is circled?

A. Yes.

Q. Does that mean Ahed Mahmoud Abdallah Abd Al-Hafez is the father of Sadeq Ahed Mahmoud Abd Al-Hafez?

A. Yes.

Q. Part 2 of the document reads "Administrative Information." Correct?

A. Yes.

Q. And one of the subsections of this reads "Place and date of the incident." Correct?

A. (Question translated - no English answer provided).

Q. What is the purpose of that subsection?

THE COURT REPORTER: I'm sorry. What is the answer? Was it translated?

THE INTERPRETER: Yes. Yes. The answer is yes.

MS. VINCZE: I can repeat the question.

Farid Ghannam

Q. And there is a subsection that reads "Place and date of the incident." Correct?

A. Yes.

Q. What is the purpose of that subsection?

A. This is documentation on the investigation report on the first page to document the date and the location of the incident.

Q. What does the incident mean?

A. The incident is documented as it's seen in the social investigation report, and it's written -- the details are written in the administrative information mentioned.

Q. So, this is a pre-printed form we are looking at that was prepared by the Martyrs' Families and Injured Care Establishment, correct?

A. Yes.

Q. And when the -- withdrawn. What information did the Martyrs' Families and Injured Care Establishment seek when it

Farid Ghannam

asked after the incident?

A. The establishment for martyrs and wounded family affairs investigates, through the social investigator, the death and the incident, and this can be done either from the death certificate, if it's available and present, or a certificate from the hospital to prove the death, if it's available.

Q. And there is some handwritten information in the subsection, correct?

A. Yes.

Q. It says "February 16, 2002 Karnei Shomron Settlement near Qalqilya." Correct?

A. Yes.

Q. Why is that there?

A. These information includes to document the date and the location of the incidents.

MS. VINCZE: Can you repeat that?

THE INTERPRETER: This information is present to document

Farid Ghannam

the location and the date of the incident.

Q. That's where and when Sadeq Ahed Mahmoud Abd Al-Hafez died, correct?

A. As it appears in the document, yes.

Q. Whose handwriting is that; who wrote that?

A. The social investigator.

Q. And how did the social investigator determine that that was the date and location of Mr. Sadeq Ahed Mahmoud Abd Al-Hafez's death?

A. From the death certificate for the martyr death, as submitted by the family of the martyr.

Q. And there's a subsection called "Details of the incident." Correct?

A. Yes.

Q. After that, it reads "Martyrdom Operation in Karnei Shomron Settlement." Correct?

A. Yes.

Q. Who wrote that?

Farid Ghannam

A. The social investigator.

Q. What is the Karnei Shomron Settlement?

A. It's one of the settlements in the West Bank.

Q. What does martyrdom operation mean?

A. As it's written in the document, it's a martyrdom operation that led to the death of a person.

Q. How did the employee of the Martyrs' Families and Injured Care Establishment determine that this was a martyrdom operation?

THE INTERPRETER: I'm sorry, this is the interpreter. It was fading out. I'll ask him to repeat.

(Clarifying.)

A. The social investigator who works in the establishment documents the martyr has happened, and he doesn't investigate the causes of the martyrdom through either the death certificate or the hospital certificate that is provided by

Farid Ghannam

documents is either a death certificate or a certificate from the hospital, and these regulations are put to the law that governs the establishment of the martyrs and wounded family affairs.

Q. Do they receive any training on what to do with the documents and information they receive?

A. Yes. It's explained within the law.

(Court reporter clarification.)

Q. I don't understand. What training do they receive?

A. He is an employee, the social investigator is an employee who implements the law that have the sections that explains the way to act, based on the divisions that govern the law and the work for that social investigator.

Q. Does he receive any training, other than receiving printouts or other electronic copies of the law that he is supposed to implement?

A. He only implements the law that

Farid Ghannam

has sections to explain the mechanism of war and how to implement the work that is needed within the social investigation mechanism.

Q. Isn't it true that on this document, martyrdom operation refers to an act by which a person seeks to become a martyr?

A. This document explains that a person died and was considered as a martyr, according to the law, and it documents the location and the date of the incident.

Q. What about his death qualified him to be a martyr?

A. The qualification is the loss of life, as the law indicated in the definition of the martyrdom.

Q. Okay. Very well. Let's turn to page 979.

MR. BERGER: Counsel, while you're doing so, we're coming up on the agreed end time, so if you can wrap it up within some period of time reasonably at 11:30, or shortly

Farid Ghannam

Q. But why does the Martyrs' Families and Injured Care Establishment care what the relationship is between these people and the martyr?

A. Because it looks into the need of the family members of this family, as a result of the loss of that person.

Q. Are the payments made to the family members?

A. The payment is usually made to the head of the household, and it's based on the family member of -- family members and the need.

Q. Let's look at JD980. There are three signatures on this document, correct?

A. Yes.

Q. The first signature is under "Recommendations of the Department." Correct?

A. Yes.

Q. Why is that signature there?

A. Definitely, to verify the accuracy of the information that came in the social investigation report.

Farid Ghannam

Q. That includes verifying the statement that -- the statement "Martyrdom Operation in Karnei Shomron Settlement"?

A. This verifies the accuracy of what the social investigator has written based on the social investigation, on the information of the family that has a martyr.

Q. But that includes the statement "Martyrdom Operation in Karnei Shomron Settlement." Correct?

A. It document what has been -- the information that has been written in the social investigator's report.

Q. Another signature is under "Decision of the Establishment's Director," correct?

A. Yes.

Q. What does that mean?

A. This indicates that at the verification of the information, that the social investigator had written by the head of the department, it is approved by the general director to consider him as a

Farid Ghannam

martyr since the date of martyrdom.

Q. What is the date of martyrdom?

THE INTERPRETER: This is the -- I will interpret what the respondent has said, but the question was misunderstood, because it said definition again.

A. So, again, as I mentioned before, the definition of martyrdom is a person who -- a person under the law is a person who loses his life, regardless of the age, as a result of a direct occupation act or as a result of the continuing occupation or as a consequence of the occupation up until the end of the law, as I mentioned previously, pursuant to the law. Up until the end of the definition, sorry, as I mentioned previously, pursuant to the law.

Q. All right. I'm going to ask my question again, because that wasn't my question.

My question was, what is the date of martyrdom?

Farid Ghannam

A. The date of martyrdom, as is mentioned in the information written in the investigation report, is February 16, 2002.

MS. VINCZE: I have no more questions for today. Let's go off the record, please.

THE VIDEOGRAPHER: We are off the record. The time is 15:38 UTC time.

MS. VINCZE: We would like a rough draft.

THE COURT REPORTER: Mr. Berger, would you like a rough draft?

MR. BERGER: Yes, please.

(Off the record at 11:38 a.m.)

FARID GHANNAM

Subscribed and sworn to before me

this day of , 2021

NOTARY PUBLIC

REPORTER'S CERTIFICATION

I, ROBERTA CAIOLA, hereby certify that FARID GHANNAM, the witness in the foregoing deposition, was duly sworn to testify to the truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein named; that the deposition is a true record of the witness's testimony as reported by me, a shorthand reporter and a disinterested person.

I further certify that I am not interested in the outcome of the said action, nor connected with, nor related to any of the parties in said action, nor to their respective counsel.

IN WITNESS WHEREOF, I have hereunto set my hand on July 30, 2021.

Roberta Caiola

ROBERTA CAIOLA

ERRATA SHEET

I, FARID GHANNAM, do hereby certify that I have read the foregoing transcript of my testimony, and further certify that said transcript is a true and accurate record of my testimony (with the exception of the following corrections listed below):

Page Line Correction

____
____
____
____
____
____
____
____
____
____
____
____

Signed under penalties of perjury this day of , 2021.

FARID GHANNAM

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

- - -

SHABTAI SCOTT SHATSKY, individually and as personal representative of the Estate of Keren Shatsky, J ANNE SHATSKY, individually and as personal representative of the Estate of Keren Shatsky, TZIPPORA SHATSKY SCHWARZ, YOSEPH SHATSKY, SARA SHATSKY TZIMMERMAN, MIRIAM SHATSKY, DAVID RAPHAEL SHATSKY, GINETTE LANDO THALER, individually and as personal representative of the Estate of Rachel Thaler, LEOR THALER, ZVI THALER, ISAAC THALER, HILLEL TRATTNER, RONIT TRATTNER, ARON S. TRATTNER, SHELLEY TRATTNER, EFRAT TRATTNER, HADASSA DINER, YAEL HILLMAN, STEVEN BRAUN, CHANA FRIEDMAN, ILAN FRIEDMAN, MIRIAM FRIEDMAN, YEHIEL FRIEDMAN, ZVI FRIEDMAN, and BELLA FRIEDMAN,

Plaintiffs,

against

Case No. 18-Civ. 12355

VIRTUAL VIDEOTAPED DEPOSITION OF FARID GHANNAM, VOLUME II
JULY 30, 2021

THE PALESTINE LIBERATION ORGANIZATION and THE PALESTINIAN AUTHORITY (a/k/a "The Palestinian Interim Self-Government Authority" and/or "The Palestinian National Authority"),

Defendants.

- - -

VIRTUAL VIDEOTAPED DEPOSITION OF FARID GHANNAM, VOLUME II, witness herein, called by the Plaintiffs, for examination, taken pursuant to the Federal Rules of Civil Procedure, by and before Kathy D. Landock, a Certified Realtime Reporter and a notary public in and for the Commonwealth of Pennsylvania, held remotely with all parties appearing from their respective locations, on Friday, July 30, 2021, at 1133 UTC time.

COUNSEL PRESENT:

For the Plaintiffs:
Melissa Maxman, Esq.
Ronald F. Wick, Esq.
(Admitted Pro Hac Vice)
COHEN & GRESSER, LLP
2001 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20006

Eszter Vincze, Esq.
Stephen M. Sinaiko, Esq.
COHEN & GRESSER, LLP
800 Third Avenue
New York, NY 10022

For the Defendants:
Mitchell R. Berger, Esq.
Joseph Alonzo, Esq.
Salim Kaddoura, Esq.
Gassan A. Baloul, Esq.
SQUIRE PATTON BOGGS
2550 M Street NW
Washington, DC 20037

ALSO PRESENT:

Corey Wainaina, Videographer
Hadeer Al-Amiri, Interpreter
Simek Shropshire
Mordechai Haller

- - -

I N D E X

WITNESS	PAGE
FARID GHANNAM	
By Ms. Vincze	104

E X H I B I T S

NUMBER	DESCRIPTION	PAGE
Exhibit 5	Production Numbers JD 184 through JD 188	111
Exhibit 6	Production Numbers JD 596 through JD 602	113
Exhibit 7	Production Numbers JD 194 through JD 198	122
Exhibit 8	Production Number JD 614	124
Exhibit 9	Production Numbers JD 689 through JD 698	129
Exhibit 10	Production Numbers JD 225 through JD 228	130
Exhibit 11	Production Numbers JD 83 through JD 85	144
Exhibit 12	Production Numbers JD 896 through JD 913	147
Exhibit 13	The law that governs the caring of families of the wounded and martyrs	160

video conference as we are proceeding.

Pursuant to Rule 29 the parties also stipulate that Ms. Landock is an appropriate officer before whom this deposition may be taken, even though she is in Pennsylvania and the witness is physically located in Jordan.

Do we agree?

MR. BERGER: I think that's correct for me. On behalf of the Defendants, this is Mitchell Berger, we agree.

MS. VINCZE: So could you please pull up Deposition Exhibit No. 4. Tab 9, Exhibit No. 4. Please page to 978.

- - -

FARID GHANNAM,

having been first duly sworn, was examined and testified as follows:

- - -

E X A M I N A T I O N

BY MS. VINCZE:

Q. Mr. Ghannam, this document provides February 16, 2002 and Karnei Shomron Settlement near Qalqilya as the place and date of the incident; correct?

A. Yes.

Q. And February 16, 2002, Karnei Shomron Settlement near Qalqilya was written by the social investigator working for the Martyrs' Families and Injured Care Establishment; correct?

A. Correct, he works for the Establishment of the Martyers and Wounded.

Q. February 16, 2002 is the date that Mr. Sadeq Ahed Mahmoud Abdel Hafez died; correct?

A. Correct.

Q. Mr. Hafez died due to injuries caused by an explosive device; correct?

A. According to the report of the social investigator, yes.

Q. And you have no reason to believe that the social investigator wasn't being truthful; correct?

A. Correct.

Q. And the explosive device that killed Mr. Sadeq Ahed Mahmoud Abdel Hafez is the one that detonated himself; correct?

A. As the social investigator documented in his report regarding the date and the place of the accident, it is a martyrdom incident near Karnei Shomron Settlement.

Q. But what I am asking you is whether the explosive device that killed Mr. Sadeq Ahed Mahmoud Abdel Hafez is one that he detonated himself. And that is correct; right?

A. According to the social investigator's report prepared by the social investigator, it stated that it's a martyrdom act.

Q. Mr. Ghannam, I am not asking you what the document says for place and date of the incident. I am asking you if it is correct that Mr. Sadeq Ahed Mahmoud Abdel Hafez was the person that detonated the explosive device that killed him. And that has a yes or no answer.

A. Yes.

Q. And the explosive device that killed Mr. Sadeq Ahed Mahmoud Abdel Hafez killed other people, too; correct?

A. According to the report of this social investigator, yes.

Q. You have no reason to believe that the social investigator was being untruthful when he said that; correct?

A. Yes.

Q. When the social investigator completed this report, he relied on this information; correct?

A. Yes.

Q. Further, when the Martyrs' Families and Injured Care Establishment designated Mr. Sadeq Ahed Mahmoud Abdel Hafez, it also relied on this information; correct? Withdrawn.

When The Martyrs' Families and Injured Care Establishment designated Mr. Sadeq Ahed Mahmoud Abdel Hafez as a martyr, it also relied on this information; correct?

A. Yes.

Q. That is why the confirmation -- pardon me. Can we page to JD 981 -- pardon me, 980.

There is text on this page stating he is to be confirmed as a martyr as of March 1, 2002 and be paid 600 shekels a month; correct?

A. Yes.

Q. And the person who wrote that was the Director General of the Martyrs' Families and Injured Care Establishment; correct?

A. The general director depended on the recommendation of the director of the department and allowed this statement.

Q. Did the Director General write the statement that he is to be confirmed as a martyr of the Al-Aqsa Martyrs as of March 1, 2002 and be paid 600 shekels a month?

A. Yes.

Q. What is an Al-Aqsa martyr?

A. Pursuant to the law from the Establishment of the Martyrs and Wounded Families Affairs defined a martyr as a person who lost his life at a specialty age as a result of the act of the occupation or as a result of the act of defending the occupation or as a military consequence of the occupation, or the detainees who died in prison or who died a year after the release from prison, or the wounded who died within three years of his injuries as a result of the injuries.

Q. Have you completed your answer, Mr. Ghannam?

A. Yes.

Q. Can you please pull up tab 12. We would designate this as Deposition Exhibit

No. 5.

(Deposition Exhibit No. 5 was marked for identification.)

BY MS. VINCZE:

Q. This is a document received from Defendants bearing production numbers JD 184 through JD 188.

Mr. Ghannam, can you see the document?

A. Yes.

Q. Do you recognize this document?

A. Yes.

Q. What is it?

A. This is a document that is the financial section used for the Establishment of the Wounded and Marters' Families Affairs regarding Abdel-Muti Mohammad Saleh Mohammad Shabaneh.

Q. The document states case type, martyr; correct?

A. Yes.

Q. That means the Martyrs' Families and Injured Care Establishment designated Mr. Abdel-Muti Mohammad Saleh Mohammad Sabaneh as a martyr; correct?

A. Yes.

Q. Under beneficiaries data, it provides the name Rahma Mustafa Abd Al-Mun'im Shabaneh; correct?

A. Yes.

Q. If you could please page to JD 188.

Mr. Ghannam, is it fair to say this shows that Rahma Mustafa Abd Al-Mun'im Shabaneh has received a monthly payment from April 2020 through April 1, 2021 as the beneficiary of Abdel-Muti Mohammad Saleh Mohammad Shabaneh?

A. Yes.

Q. And she has received a monthly stipend -- withdraw.

And she has received a monthly payment of 1,400 shekels; correct?

A. Yes.

Q. And these are payments made to Rahma Mustafa Abd Al-Mun'im Shabaneh because Abdel-Muti Mohammad Saleh Mohammad Shabaneh has been designated as a martyr; correct?

A. Yes.

Q. Could you please pull up tab 13. We would designate this as Deposition Exhibit No. 6.

(Deposition Exhibit No. 6 was marked for identification.)

BY MS. VINCZE:

Q. This is a document we received from Defendants with production numbers 596 -- JD 596 through JD 602.

Mr. Ghannam, can you see the document?

A. Yes.

Q. What is it?

A. It's a social investigation regarding martyr.

Q. This is a social investigative report prepared for the case of Abdel-Muti Mohammad Saleh Mohamad Shabaneh; correct?

A. Yes.

Q. That is the same person who we discussed when we were speaking about Exhibit No. 5; correct?

A. Yes.

Q. And it says Case: Martyr of Al-Aqsa Intifada; correct?

A. Yes.

Q. Let's turn to JD 597, please. This document has a section called beneficiary's

full name; correct?
A. Yes.
Q. And the name provided is Rahma Mustafa Abd Al-Mun'im Shabaneh; correct?
A. Yes.
Q. Beneath that it says mother's full name; correct?
A. Yes.
Q. And the name provided is Rahma Mustafa Abd Al-Mun'im Shabaneh; correct?
A. Yes.
Q. So Rahma Mustafa Abd Al-Mun'im Shabaneh is the mother of Abdel-Muti Mohammad Saleh Mohammad Shabaneh; correct?
A. Yes.
Q. And this is the same Rahma Mustafa Abd Al-Mun'im Shabaneh who, according to -- withdrawn.
So Rahma Mustafa Abd Al-Mun'im Shabaneh -- withdrawn.
This is the same Rahma Mustafa Abd Al-Mun'im Shabaneh that has received payments from April 2020 through April 2021 as the beneficiary of Abdel-Muti Mohammad Saleh Mohammad Shabaneh; correct?

A. Yes.
Q. And further down the page it says place and date of the incident; correct?
A. Yes.
Q. And the place and date of the incident provided is July 11, 2003, Jeruselam Mahne Yehuda Street; correct?
A. It's June 11, 2003.
Q. So the place and date of the incident is June 11, 2003, Jerusalem Mahne Yehuda Street; correct?
A. Yes.
Q. And that was written by the social investigator employed by the Martyrs' Families and Injured Care Establishment that wrote this report; correct?
A. Correct.
Q. Beneath that it says details of the incident; correct?
A. Yes.
Q. The details of the incident are martyrdom operation in the City of Jerusalem, Mahne Yehuda Street, which caused the death of 17 Israelis and injured nearly 100; correct?
A. Yes.

Q. And that also was written by the social investigator employed by the Martyrs' Families and Injured Care Establishment that wrote this report; correct?

A. Yes.

Q. Mr. Abdel-Muti Mohammad Saleh Mohammad Shabaneh died in that martyr operation; correct?

A. Yes.

Q. He died because he -- withdrawn.

He died due to injuries caused by the detonation of an explosive device; correct?

A. Correct.

Q. And that explosive device was one that he detonated himself; correct?

A. According to the report of the social investigator, yes.

Q. And you have no reason to believe that the social investigator wasn't being truthful when he wrote that; correct?

A. Yes.

Q. And the explosive device that Mr. Abdel-Muti Mohammad Saleh Mohammad Shabaneh detonated killed others, too; correct?

MR. BERGER: Objection, asked

and answered.

BY MS. VINCZE:

Q. Mr. Ghannam, you may respond.

A. According to what is written in the social investigator's report, yes.

Q. And you have no reason to believe that the social investigator wasn't being truthful when he wrote this report; correct?

MR. BERGER: Objection, asked and answered. You may answer again.

THE WITNESS: Yes.

BY MS. VINCZE:

Q. And the explosive device of Mr. Abdel-Muti Mohammad Saleh Mohammad Shabaneh also injured other people; correct?

MR. BERGER: Objection, asked and answered. You may answer again.

THE WITNESS: According to the report of the social investigator, yes.

BY MS. VINCZE:

Q. And you have no reason to believe that when the social investigator wrote that this martyrdom operation injured nearly 100 he was not being truthful; correct?

MR. BERGER: Objection, asked

and answered. You may answer again.

THE WITNESS: Yes.

BY MS. VINCZE:

Q. And it was the bombing of -- withdrawn.

And it was the details of the incident -- withdrawn.

And it was this incident on June 11, 2003 that caused Mr. Abdel-Muti Mohammad Saleh Mohammad Shabaneh to be designated as a martyr; correct?

A. Yes.

Q. Let's turn to JD 599. There is a section of this called recommendation of the department; right?

A. Yes.

Q. It states he was martyred as a result of a bomb attack in Jerusalem, Ishadi; correct?

A. Yes.

Q. And it says to be confirmed as a martyr of the Al-Aqsa Intifada; correct?

A. Yes.

Q. This is a recommendation that because Mr. Abdel-Muti Mohammad Saleh Mohammad

Shabaneh is designated as a martyr, his mother received monthly payments; correct?

A. It was social need, especially that the house that the mother of the martyr was living in was destroyed by the occupation -- by the Israeli occupation forces.

Q. But if Mr. Abdel-Muti Mohammad Saleh Mohammad Shabaneh had not been designated a martyr, then his mother would not be receiving these payments; correct?

A. Pursuant to the law, yes.

Ms. VINCZE: This is for the court reporter, I believe it's pursuant to the law.

MR. BERGER: I think it's still missing a word. Pursuant to the law, yes.

(Discussion held off the record.)

BY MS. VINCZE:

Q. Mr. Ghannam, there is a section of this called confirmation of the Director General; correct?

A. Yes.

Q. That states confirmed as a martyr of

probably what might be there.

MR. BERGER: I'll make a representation to you given the limited amount of time we have that it is pre-April 2020 payment amounts. And since payment information is relevant only after April 18, 2020 it was redacted.

MS. VINCZE: We will take this up later because I'm not inclined to spend a lot of time on it now, but I will note similar information has not been redacted in other documents.

BY MS. VINCZE:

Q. Mr. Ghannam, it was the Director General that wrote, confirmed as a martyr of the Al-Aqsa Intifada as of June 1, 2003 and will be paid some unknown amount shekels a month; correct?

A. Yes.

Q. When he confirms Mr. Abdel-Muti Mohammad Saleh Mohammad Shabaneh, he was relying on the information contained in the social investigative report; correct?

Q. That includes the information provided on JD 597; correct?

A. Yes.

Q. There's no reason to believe that the information in this social investigative report is not accurate; correct?

A. Yes.

Q. Can you please pull up tab 10. We would like to designate this as Deposition Exhibit No. 7.

(Deposition Exhibit No. 7 was marked for identification.)

BY MS. VINCZE:

Q. This is a document produced to us by Defendants bearing production numbers JD 194 through JD 198.

Mr. Ghannam, can you see this document?

A. Yes.

Q. What is it?

A. This is a document produced from the Establishment of the Wounded and Martyrs' Families Affairs regarding the martyr, Ramiz Fahmi Izz al-Din Aslam. It's regarding the financial information.

Q. This document says case type, martyr; correct?

A. Yes.

Q. That means that Mr. Ramiz Fahmi Izz al-Din Aslam has been designated as a martyr by the Martyrs' Families and Injured Care Establishment; correct?

A. Correct, yes.

Q. And there's a section called beneficiary's data; correct?

A. Yes.

Q. And the name provided under that section is Ghalia Zaki Abd Al-Hamid Abu Salim; correct?

A. Yes.

Q. Let's please page to JD 198. Mr. Ghannam, is it fair to say this shows that Ghalia Zaki Abd Al-Hamid Abu Salim has been receiving monthly payments from April 2020 through April 1, 2021?

A. Yes.

Q. And she has been receiving those payments as the beneficiary of Ramiz Fahmi Izz al-Din Aslam; correct?

A. Yes.

Q. These are monthly payments of 1,400 shekels; correct?

A. Yes.
Q. She is receiving these payments because the Martyrs' Families and Injured Care Establishment has designated Ramiz Fahmi Izz al-Din Aslam as a martyr; correct?
A. Yes.
Q. Let's please pull up tab 11. Mr. Ghannam, can you see the document?
A. Yes.
Q. What is it? Withdrawn.
Do you recognize it?
A. Yes.
Q. What is it?
A. This is a social investigation document produced from the Establishment of the Wounded and Martyrs Family Affairs regarding the martyr Ramiz Fahmi Izz al-Din Aslam.
Q. This is the same Ramiz Fahmi Izz al-Din Aslam that we discussed previously with respect to Exhibit No. 7; correct?
A. Yes.
Q. We would like to designate this as Deposition Exhibit No. 8.
(Deposition Exhibit No. 8 was marked for identification.)

BY MS. VINCZE:

Q. Can you please page to JD 614. There's a section called beneficiary's full name; correct?

A. Yes.

Q. And the name provided is Ghalia Zaki Abd Al-Hamid Abu Salim; correct?

A. Yes.

Q. And beneath that there's a section called mother's full name; correct?

A. Yes.

Q. And the name provided there is Ghalia Zaki Abd Al-Hamid Abu Salim; correct?

A. Yes.

Q. So Ghalia Zaki Abd AlHamid Abu Salim is the mother of Ramiz Fahmi Izz al-Din Aslam; correct?

A. Yes.

Q. This is the same Ghalia Zaki Abd Al-Hamid Abu Salim who has been receiving monthly payments as the beneficiary of Ramiz Fahmi Izz al-Din Aslam; correct?

A. Yes.

Q. And there is a section called place and date of the incident; correct?

A. Yes.

Q. The information provided there is September 9, 2003, Jerusalem; correct?

A. Yes.

Q. That information was provided by the investigator that completed this report for the Martyrs' Families and Injured Care Establishment; correct?

A. Yes.

Q. There's a section beneath that that says details of the incident; correct?

A. Yes.

Q. The information provided there is, the martyr used an explosive belt which he wore wore on his body to perpetrate the martyrdom attack on a coffee shop in the City of Jerusalem. The attack took place shortly before midnight Tuesday, when the coffee shop was filled with Zionists. Seven Zionists were killed and dozens were wounded as a result; correct?

A. Yes.

Q. That information was also provided by the social investigator that completed this report on behalf of the Martyrs' Families and

Injured Care Establishment; correct?
A. Yes.
Q. And you have no reason to doubt the accuracy of that statement, do you?
A. Yes.
Q. When the Martyrs' Families and Injured Care Establishment designated Ramiz Fahmi -- pardon me. Withdrawn.
When the Martyrs' Families and Injured Care Establishment designated Ramiz Fahmi Izz al-Din Aslam as a martyr, it relied upon the details provided in this statement; correct?
A. Correct.
Q. Let's turn to JD 166. There is a section called recommendation of the department; correct?
A. Yes.
Q. Beneath that it states a martyr of the Al-Aqsa Intifada, single. His parents are alive. Became a martyr as a result of his martyrdom operation in Jerusalem, therefore we recommend that you confirm his status as a martyr of the Al-Aqsa Intifada in accordance with the regulations; correct?

A. Yes.

Q. The martyrdom operation referred to in this statement is the incident described on JD 614; correct?

A. Yes.

Q. And there is a section beneath that that provides confirmation of the Director General; correct?

A. Yes.

Q. Beneath that section it states confirmed as a martyr of the Al-Aqsa Intifada as of September 1, 2003. Will be paid 600 shekels a month; correct?

A. Yes.

Q. When confirming Mr. Ramiz Fahmi Izz al-Din Aslam as a martyr, the Director General relied on the information in the social investigative report; correct?

A. He depended on the information present in the social investigator's report and the recommendation from the director of the department.

Q. To clarify, is that the recommendation on the top of this page?

A. Yes.

you quickly scroll up to the translation. Can you scroll back down to the original. So we would like to designate this as Exhibit No. 10. This is a document produced by Defendants bearing production numbers JD 225 through JD 228.

(Deposition Exhibit No. 10 was marked for identification.)

BY MS. VINCZE:

Q. Mr. Ghannam, can you see the document?

A. Yes.

Q. Do you recognize the document?

A. Yes.

Q. What is it?

A. This is a document used from the Establishment of the Wounded and Martyrs' Family Affairs regarding Abdel Rahman Idris Muhammad al-Shaludi. It concerns the financial section.

Q. The document states case type, martyr; correct?

A. Yes.

Q. That means the Martyrs' Families and Injured Care Establishment has designated Abdel

Rahman Idris Muhammad al-Shaludi as a martyr; correct?

A. Yes.

Q. And there's a section called beneficiary's data; correct?

A. Yes.

Q. And the name provided in that section is Idris Muhammad Yahya al-Shaludi; correct?

A. Yes.

Q. Can we please page down to JD 228.

Mr. Ghannam, is it fair to say this shows that Idris Muhammad Yahya al-Shaludi has been receiving monthly payments from April 2020 through April 2021?

A. Yes.

Q. These are payments he is receiving as the beneficiary of Abdel Rahman Idris Muhammad al-Shaludi; correct?

A. Yes.

Q. And these are payments wired to Idris Muhammad Yahya al-Shaludi from funds under the control of the Palestinian Authority; correct?

MR. BERGER: Objection to the

form, lacks foundation.

BY MS. VINCZE:

Q. You may answer, Mr. Ghannam.

A. Yes.

Q. So these are payments paid to Idris Muhammad Yahya al-Shaludi from funds under the control of the PA; correct?

A. Yes.

Q. These are paid using the banking information provided on JD 225; correct?

A. Yes.

Q. Can you please pull up Exhibit No. 10 -- sorry, Exhibit No. 9, which is the document we accidently pulled up previously.

Mr. Ghannam, do you recognize this document?

A. Yes.

Q. What is it?

A. It's a document regarding social investigation for Abdel Rahman Idris Muhammad al-Shaludi produced from the Establishment of the Wounded and Martyrs' Family Affairs.

Q. At the top of this document it says Palestine Liberation Organization, does it not?

A. Yes.

Q. That is because the social investigator working on this report was working for the Palestine Liberation Organization; correct?
A. He was working for the Establishment of the Wounded and Martyrs' family Affairs, and as I mentioned previously, the Establishment of the Wounded and Martyrs' Family Affairs was part of the institution of PLO.
Q. Let's turn to -- withdrawn.
Let's turn to JD 690, please. Under case's name the name provided is Abdel Rahman al-Shaludy; correct?
A. Yes.
Q. In the middle of the page there's a section called administrative information; correct?
A. Yes.
Q. And it provides a military rank of combatant; correct?
A. Yes.
Q. That is because Mr. Abdel Rahman al-Shaludy was a member of Al-Aqsa; correct?
A. Can you repeat the question again, please.

Q. That is because Mr. Abdel Rahman Idris Muhammadal-Shaludy was a member of Al-Aqsa; correct?

A. Yes.

Q. And beneath that there's a section called place and date of the incident; correct?

A. Yes.

Q. The place and date provided is October 22, 2014, French Hill; correct?

A. Yes.

Q. And beneath that section there's a section called details of the incident; correct?

A. Correct.

Q. And the details of the incident provided are: He became a martyr, may Allah have mercy upon him, when he executed a vehicular attack against a group of settlers in the City of Jerusalem, French Hill. The attack claimed the lives of two settlers and injured six others. As a result, one of the settlers opened fire immediately after he got out of his car, and so he was martyred on the spot; correct?

A. Yes.

Q. That statement was written by the social investigator working for the Martyrs' Families and Injured Care Establishment that wrote this report; correct?

A. From the investigator that was for the Establishment of the Wounded and Martyrs Family Affairs, yes.

Q. And you have no reason to doubt the accuracy of that statement, do you?

A. Yes.

Q. Let's turn to JD 691. This page contains a family table; correct?

A. Yes.

Q. And in the first row of that table it says Idris Muhammad Yahya al-Shaludi, father; correct?

A. Yes.

Q. That is because Idris Muhammad Yahya al-Shaludi is the father of Abdel Rahman Idris Muhammad al-Shaludi; correct?

A. Yes.

Q. This is the same Idris Muhammad Yahya al-Shaludi that has been receiving monthly payments as the beneficiary of Abdel Rahman Idris Muhammad al-Shaludi; correct?

A. Yes.
Q. Because the Abdel Rahman Idris Muhammad al-Shaludi referred to in these documents is the same person as the Abdel Rahman Idris Muhammad al-Shaludi referred to in the exhibit we previously discussed; correct?
A. Yes.
Q. Let's turn to page 692. The top of the page reads recommendation of the department; correct?
A. Yes.
Q. Beneath that it states the case should be confirmed according to the recommendations and the necessary steps, as the martyr's parents are alive; correct?
A. Yes.
Q. That was written by the social investigator that filled out this report; correct?
A. Yes.
Q. And the martyr that statement refers to is Abdel Rahman Idris Muhammad al-Shaludi; correct?
A. Yes.
Q. When determining that Abdel Rahman

Idris Muhammad al-Shaludi is a martyr, the social investigator relied on the details of the incident provided on page JD 690; correct?

A. Yes.

Q. Beneath that it states decision of the Establishment's director; correct?

A. Yes.

Q. And beneath that it states, I recommend that the case will be confirmed as a martyr of Al-Aqsa Martyrs as of the date of his martyrdom, and the president's honorary payment will be added to his first allowance.

INTERPRETER: It's not on the screen.

Q. Can you please page down to 692. I withdraw the question.

Beneath the decision of the Establishment's director it states, I recommend that the case will be confirmed as a martyr of Al-Aqsa Martyrs as of the date of his martyrdom, and the president's honorary payment will be added to his first allowance. The beneficiary of the payment is his father, Idris Muhammad Yahya al-Shaludi, ID No. 02347395, and the number, and there's a redacted number. Is that right?

A. Yes.

Q. The date of the martyrdom is October 22, 2014; correct?

A. Yes.

Q. Because that is the date of the incident described in details of the incident; correct?

A. Yes.

Q. The incidents that occurred that day are what made Mr. Abdel Rahman Idris Muhammad al-Shaludi a martyr for purposes of the Martyrs' Families and Injured Care Establishment; correct?

A. That's according to the law of the Establishment of the Wounded Martyrs' Family Affairs, yes.

Q. And the incidents as described in JD 690 are the ones considered by the Martyrs' Families and Injured Care Establishment when it determined that Mr. Abdel Rahman Idris Muhammad al-Shaludi was a martyr under the law you referenced; correct?

A. Yes.

Q. When was the determination made that

of paying the expenses of the burial of the martyr.

Q. Is that the complete answer?

A. Yes.

Q. Only martyrs qualify for this payment; correct?

A. The family of the martyr, the family of the martyr is the one who qualifies for this payment pursuant to the law and before the financial regulations.

Also this honorary payment is dispensed to the employee who dies, and this amount is around 5,000 shekels, it's dispensed for one time only.

Q. This was a payment of 6,000 shekels; correct?

A. Yes.

Q. So this payment was made because Mr. Abdel Rahman Idris Muhammad al-Shaludi was designated as a martyr; correct?

A. Pursuant to the law the payment was made for him.

Q. To clarify, the payment would not have been made if he had not been designated a martyr; correct?

A. Yes.

Q. When you refer to the law, you refer to the law dated 2016?

A. Yes.

Q. But the date this payment was authorized was in February 2015, no? Withdrawn.

This payment was authorized in 2015; correct?

A. As I mentioned previously in my response, there was financial regulations that govern the institution or the establishment since it was established, and these divisions were part -- then became part of the law, the Palestinian law, as a division in that law.

Q. Mr. Ghannam, I'm just trying to understand your answer. You're saying that there were certain preexisting regulations that were later put into this 2016 law?

A. Yes.

Q. Are these regulations anywhere in writing?

A. I spoke with the Establishment of the Wounded and Martyrs Family Affairs about these regulations. They told me that it's present and they're going to search for it, look for it, search for it and provide it for me when they find it, if they find it within their possession.

Q. Does that mean you've never seen them?

A. As I mentioned before, I spoke with them and they told me they will look for it. So I didn't see it, I just spoke with them about it.

MS. VINCZE: Mr. Berger, when you do receive these documents, we would like them produced.

MR. BERGER: Once we see them we'll be happy to review them and let you know our position on that, but I can't see why we wouldn't.

BY MS. VINCZE:

Q. Can you please pull up tab 14. I would like to designate this as Exhibit No. 11.

(Deposition Exhibit No. 11 was marked for identification.)

BY MS. VINCZE:

Q. These are documents we received from Defendants with Bates numbers -- pardon, with production numbers JD 83 through JD 85.

Mr. Ghannam, can you see the document?

A. Yes.

Q. Do you recognize the document?

A. Yes.

Q. What is it?

A. This document is produced from the Establishment of the Martyrs and Wounded Family Affairs regarding Izz al-Din Shuheil Ahmad al-Masri, it concerns the financial section.

Q. Now, this document states case type, martyr; correct?

A. Yes.

Q. That means the Martyrs' Families and Injured Care Establishment has designated Izz al-Din Shuheil Ahmad al-Masri as a martyr; correct?

A. Yes.

Q. There is a section beneath that that reads beneficiary's data; correct?

A. Yes.

Q. And the name provided in that section is Fatma Hamed Isma'il Masri; correct?

A. Yes.

Q. Can you please page down to JD 87.
Mr. Ghannam, is it fair to say this shows that Fatma Hamed Isma'il Masri has been receiving payments on a monthly basis from April 2020 through April 2021?
A. Yes.
Q. And she receives these payments as the beneficiary of Izz al-Din Shuheil Ahmad al-Masri; correct?
A. Yes.
Q. These payments are made from funds under the control of the PA; correct?
A. Yes.
Q. Because all payments made to qualifying beneficiaries of people designated as martyrs are made from funds under the control of the PA; correct?
MR. BERGER: Objection, indefinite as to time.
BY MS. VINCZE:
Q. You may answer, Mr. Ghannam.
A. Yes.
Q. Thank you.
To your understanding, does Fatma Hamed Isma'il Masri continue to receive these

payments monthly as of today?

A. Yes.

Q. Can you please pull up tab 15. We would like to designate this as Exhibit No. 12.

(Deposition Exhibit No. 12 was marked for identification.)

BY MS. VINCZE:

Q. This is a document produced to us from Defendants bearing production numbers JD 896 through JD 913.

Mr. Ghannam, can you see the document?

A. Yes.

Q. Do you recognize it?

A. Yes.

Q. What is it?

A. This is a document we use from the Establishment of the Wounded and Martyrs' Family Affairs regarding the renewal of the financial information and the payment pursuant to the law for the martyr Izz al-Din Shuheil Ahmad al-Masri.

Q. And that is the same Izz al-Din Shuheil Ahmad al-Masri that we discussed when we were speaking about Exhibit No. 11?

A. Yes.

Q. At the top of the document it reads Palestinian Liberation Organization; correct?

A. Yes.

Q. And the document is signed by the General Director of Allowances; correct?

A. Yes.

Q. Is the General Director of Allowances an employee of the PLO?

MR. BERGER: Objection, indefinite as to time. You may answer.

THE WITNESS: Yes.

BY MS. VINCZE:

Q. The document is dated October 20, 2020, is it not?

A. Correct.

Q. So when the General Director of Allowances signed it, he signed it in 2020, didn't he?

A. Yes.

Q. It says, there's a section called director's opinion; correct?

A. Yes.

Q. It states, I confirm the -- I can't read the next word. What does it say after director's opinion?

A. It says I confirm the recommendation and the payment is renewed for the beneficiary, the mother of the martyr. And she is the beneficiary and she's still living, this is according to the documents attached and pursuant to the law of the establishment.

Q. And there's a section below that that states procedure of the Director General; correct?

A. Yes.

Q. It states, renewal of the confirmation of the payment in accordance with regulations; correct?

A. Yes.

Q. So the General Director of Allowances is involved in confirming that payments continue to be made to the beneficiary of Izz al-Din Shuheil Ahmad al-Masri; correct?

A. Yes.

Q. Can you please go to JD 904. Actually, can we go to JD 903.

Mr. Ghannam, what is this document?

A. It's a social investigation conducted by the Establishment of the Wounded

A. Yes.
Q. That means Fatma Hamed Isma'il Masri is the mother of Izz al-Din Shuheil Ahmad al-Masri; correct?
A. Yes.
Q. And this is the same Fatma Hamed Isma'il Masri who has been receiving monthly payments as the beneficiary of Izz al-Din Shuheil Ahmad al-Masri since April 2020; correct?
A. Yes.
Q. There's a section of this page titled administrative information; correct?
A. Yes.
Q. And beneath that it says organizational affiliation Hamas; correct?
A. Yes.
Q. That is because Izz al-Din Shuheil Ahmad al-Masri is a member of Hamas; correct?
A. According to the report, yes.
Q. And you have no reason to doubt the accuracy of that statement, do you?
A. Yes.
Q. It states place and date of the incident, August 9, 2001, West Jerusalem Sbarro

Restaurant; correct?
A. Yes.
Q. The person who wrote August 9, 2001, West Jerusalem Sbarro Restaurant was the employee of the Martyrs' Families and Wounded Establishment that filled out this form; correct?
A. Yes.
Q. And beneath that it says details of the incident; right?
A. Yes.
Q. Following that it states, became a martyr as a result of a martyrdom operation in West Jerusalem on August 9, 2001; correct?
A. Yes.
Q. And the person who wrote that statement was the social investigator that filled out this form for the Martyrs' Families and Injured Care Establishment; correct?
A. Yes.
Q. Izz al-Din Shuheil Ahmad al-Masri died on August 9, 2001; correct?
A. Yes.
Q. And he died due to injuries caused by an explosive device; correct?

A. Yes.
Q. And the explosive device that caused his death was one that he detonated himself; correct?
A. According to the report, yes.
Q. Do you have any reason to doubt the accuracy of that statement?
A. No.
Q. When Izz al-Din Shuheil Ahmad al-Masri detonated the explosive device on August 9, 2001, he killed others, too; correct?
A. According to the report, yes.
Q. And you have no reason to think that is inaccurate, do you?
A. Yes.
Q. The bombing that caused his death and the death of the others is the incident described in details of the incident on JD 904; correct?
A. Yes.
Q. Let's turn to JD 907, please. Thank you.
At the top of this page it reads recommendations of the department; correct?
A. Yes.

Q. Beneath that it states single. The mother is alive. The martyr has five siblings. We recommend to confirm the above-named martyr as a martyr of Al-Aqsa Intifada; correct?

A. Both parents, not only the mother are still living, yes.

Q. And it also states we recommend to confirm the above named martyr as a martyr of Al-Aqsa Intifada; correct?

A. Yes.

Q. The person who wrote that statement is the social investigator who filled out this form on behalf of the Martyrs' Families and Injured Care Establishment; correct?

A. Yes.

Q. And in determining that Izz al-Din Shuheil Ahmad al-Masri is a martyr, that person relied on the incidence described on JD 904; correct?

A. Yes.

Q. Because it was the circumstances of Izz al-Din Shuheil Ahmad al-Masri's death that made him a martyr; correct?

A. Yes.

Q. And beneath that it reads decision

of the Establishment's director; correct?
A. Yes.
Q. And it states to be confirmed as a martyr of the Al-Aqsa Intifada as of August 1, 2001?
A. Yes.
Q. That is because the Martyrs' Families and Injured Care Establishment considered the circumstances of the death of Izz al-Din Shuheil Ahmad al-Masri to be part of the Al-Aqsa Intifada; correct?
A. Yes.
Q. Let's go to JD 908, please.
There is a section of this that reads confirmation of the Director General; correct?
A. Yes.
Q. Beneath that reads, to be confirmed as a martyr of the Al-Aqsa Martyrs as of August 1, 2001, to be paid, and then the number is redacted; correct?
A. Yes.
Q. That is because Izz al-Din Shuheil Ahmad al-Masri's mother qualified to receive payments due to his designation as a martyr;

correct?

A. She was eligible for the payment because the divisions of the law to consider him as a martyr applied to her.

Q. But the person that filled out this document determined that Izz al-Din Shuheil Ahmad al-Masri qualified as a martyr under that law; correct?

MR. BERGER: Objection, asked and answered. You may answer again.

THE WITNESS: Pursuant to the law and the social status, yes.

BY MS. VINCZE:

Q. If Izz al-Din Shuheil Ahmad al-Masri had not been determined to be a martyr by the Martyrs' Families and Injured Care Establishment, then his mother would not qualify to receive payments under this program; correct?

MR. BERGER: Objection, hypothetical. You may answer.

THE WITNESS: Pursuant to the law and the social status of this family.

MS. VINCZE: Let's go off the record and take a five-minute comfort break.

COMMONWEALTH OF PENNSYLVANIA)
) SS
COUNTY OF WASHINGTON)

CERTIFICATE

I, Kathy D. Landock, a Notary Public in and for the Commonwealth of Pennsylvania, do hereby certify that the witness, FARID GHANNAM, was by me first duly sworn to testify the truth, the whole truth, and nothing but the truth; that the foregoing deposition was taken at the time and place stated herein; and that the said deposition was recorded stenographically by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witness, all to the best of my skill and ability.

I further certify that I am not a relative, employee or attorney of any of the parties, or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 2nd day of August, 2021.

Kathy D. Landock

Kathy D. Landock, Notary Public
Certified Realtime Reporter

My Commission Expires:
March 28, 2023